

STEYNING PARISH COUNCIL RESPONSE
WEST SUSSEX COUNTY COUNCIL JOINT MINERAL LOCAL PLAN

Introduction:

Steyning Parish Council believe that WSCC's Local Minerals Plan proposing Ham Farm for 850,000 tonnes of soft sand extraction has failed to take account of key planning conditions nor has it been properly communicated to the public in general, specifically people who are immediately adjacent to the proposed site. It should be noted that the field known as Ham Farm is part of Wappingthorn Farm and owned by the same person; using the site name of Ham Farm has been misleading.

Steyning Parish Council object to this mineral proposal and request that the Ham Farm site is withdrawn from the Draft Mineral Plan on the following grounds:

- 1: Failure by WSCC to uncover an existing restrictive covenant, which is enforceable by an adjoining owner. Steyning Parish Council submits that this will prevent extraction of sand from the Ham Farm (Wappingthorn Farm) site. The landowner was fully aware of this fact in 2013/14.
2. Failure by WSCC in their statutory duty with regard to the National Planning Policy Framework (NPPF) and the Horsham District Planning Policy Framework (HDPPF)

WSCC have failed in their statutory duty as they have not correctly addressed the principles of the National Planning Policy Framework Policy 4 Conserving and Promoting Sustainable Transport paragraphs 29 – 41(PST); Policy 11 Enhancing the Natural Environment Paragraphs 109– 125 (ENE) and policy 13 Facilitating the Sustainable Use of Minerals (FSUM) Paragraphs 142 – 149.

3. Unacceptable impact on the Landscape

The site for the proposed sandpit is immediately adjacent to the boundary of the South Downs National Park run by the South Downs National Park Authority (SDNPA). The statutory requirement set out in the Countryside and Rights of Way Act 2000 states:

“Local Authorities have a duty to have regard to the purposes of National Park designation in the consideration of development proposals that are situated outside National Park boundaries but which might have an impact on the setting of and implementation of the statutory purposes of these protected areas, i.e. conservation of the landscape and scenic beauty of the National Park.”

Extraction of sand at Ham Farm would have an adverse effect upon the principles of National park designation and therefore contravene the purposes of National Park designation, in particular the landscape and scenic beauty of the park (see paragraph 115 of the framework)

Steyning Parish Council also feels the proposal is contrary to the SDNPA Local Plan, as it contravenes its core purposes and core planning policies.

The following extracts from the Mineral Site Selection Report demonstrate a complete failure of compliance with the further SDNPA principles set out in this report:

The SDNPA Local Plan Preferred Options documents approved in July 2015 states:

“Core Policy SD1: Sustainable Development in the South Downs National park:

- 1. When considering development proposals the Authority will take a positive approach that reflects presumption in favour of sustainable development provided that they are:
 - a) Consistent with National Park purposes;*
 - b) Pay due regard to the duty in pursuit of the purposes;*
 - c) Conserve and enhance the special qualities of the National Park;*
and
 - d) Comply with all the relevant policies within this Local Plan.**

Fig 1.1 The Purposes and Duty

- 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area*
- 2. To promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.*

The SDNPA also has a duty when carrying out its purposes to: *“Seek to foster the economic and social well-being of the local communities within the National Park.”* In addition Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. *“Where there is an irreconcilable conflict between the statutory purposes, statute requires the Sandford Principle to be applied and the first purpose of the National Park will be given priority.”*

Supporting Text:

4.5 The SDNPA will work in partnership with other local authorities to ensure that development outside of the National Park does not have a detrimental impact on its setting or otherwise prejudice the achievement of the National Park purposes (Figure 1.1).”

The SDNPA website page on Minerals and Waste states:

“Major minerals and waste development could impact on the qualities which make the National Park special – its landscapes and local distinctiveness – and will therefore be refused unless they can be demonstrated that exceptional circumstances exist and the development is in the public interest.”

Steypning Parish Council believes that WSCC have failed to demonstrate the exceptional circumstances existing at Ham Farm against the 25 sites that were considered and strongly feels that development is against the public interest in this location.

This site is highly visible from Chanctonbury Hill and other important view-points along the South Downs. (**See photographic evidence Appendix 1**), which would significantly reduce enjoyment of visitors to this area.

No consideration of the inevitable light pollution from the site has been addressed by WSCC. The following extract from the HSE Quarries regulations 1999, demonstrates the potential for unacceptable light pollution (2):

“Regulation 23 Lighting - The operator shall ensure that every part of a quarry in which a person is likely to be exposed to risks in the event of the failure of artificial lighting is provided with emergency lighting of adequate intensity and where that is impractical persons at work in that place shall be provided with a personal lamp. 177 General lighting matters and emergency lighting inside buildings are covered by regulation 8 of the Workplace Regulations. Relevant advice is contained in the Approved Code of Practice to that regulation. Lighting a quarry is much more difficult than lighting a flat area because of the uneven surfaces and the consequential deceptive effects of shadows. 178 Emergency lighting is required where work continues after dark and safe evacuation is not possible without artificial lighting. Where lighting is provided by independently powered lighting towers and failure of any one tower would still leave enough light to enable people to leave the area safely, no further emergency lighting need be provided. 179 Lights provided on vehicles ought to be sufficient to enable them to be driven safely, but additional lighting may be required for manoeuvring operations such as reversing or tipping. 180 The safety of security staff and others who have to move around the quarry at night must be ensured by an appropriate combination of torches and floodlights.”

Excavation of the Ham Farm site would have an unacceptable and cumulative impact on the landscape, as it would create a simultaneous view to include the Storrington and Washington quarries, which are highly visible from the South Downs and have not been restored. (**See Photographic evidence, Appendix 2**).

Buncton Manor Farm, a site adjacent to the SDNP (and close by the Ham Farm site) was rejected by the SDNP Landscape Officer on the following grounds:

SDNPA Landscape Officer: *This site has the potential for significant impacts on views from the SDNP from Chanctonbury Hill and the Open Access land along the Scarp slope of the chalk ridge to the north of Chanctonbury Hill. In some locations these impacts are screened by the topography and slope profile combined with woodland along the scarp slope. However there are areas where there is clear visibility over the site, albeit at distance within a wide panorama. The site, a series of agricultural fields, is poorly screened with denuded and gappy hedgerows, particularly along its southern boundary. It is well screened from the Underhill Road due mainly to roadside vegetation, topography and the set back from the road. The landscape, a section of the Scarp foot slopes character area, is undulating and quite variable in scale from enclosed and intimate where wooded areas and hedgerows are frequent, through to more open sections of arable land where the topography and scale of the landscape is more consistent and less enclosed. Woodland and hedgerow*

*screening could be effective at reducing this impact to some degree locally, although this approach is less likely to effectively mitigate the impact on views from the higher ground to the south of the site. There are open and panoramic views from the chalk ridge, which overlook the existing Rock Common and Chantry Lane sandpits. These pits are sequentially and simultaneously visible from the PROW and access land on the chalk ridge to the south. This site would also be visible sequentially in some locations. **Opening a further quarry in this location prior to restoration of Chantry Lane and Rock Common would lead to unacceptable combined cumulative impacts on the panoramic views from the chalk ridge.** Chanctonbury Hill, and its surrounding downland are a well-known and accessible tourist destination in the SDNP. Views at this location would be considered to be of the highest sensitivity owing to the location being within a National Park, on a National Trail and at a viewpoint destination. Access to the area is from the car parks at the foot of Chanctonbury Hill and south of Washington. There are also a significant number of users on the National Trail”*

Steyping Parish Council believe that the Ham Farm site should be rejected for the same reasons.

The following extracts from the Mineral Site Selection Report demonstrate a complete failure of compliance with the further SDNPA principles set out in this report:

“LUC Landscape and Capacity Study 2015:

The updated study did not revise the 2011 sensitivity or capacity scores.

SDNPA Addendum to WSCC Minerals Local Plan Site assessment:

The site is visually sensitive in views from the top of the scarp in sections where woodland does not block wider views. The ZTV shows visibility from Wiston Park and it is likely that there would be some negative experiential impacts (tranquility, remoteness) on visitors to the parkscape should this site come forward. Views to the south of the parkscape would not be affected.

Design of the site operations should be undertaken sensitively and with appropriate levels of screening. Existing trees around the perimeter of the site should be retained.

The entrance to the site should be carefully designed to minimise urbanising impacts on the SDNPA.

Transport and access:

***The results of the traffic impact assessment** show that the traffic related to the development would not have any adverse impact on the Lorry Route Network and would not therefore, have a severe impact if the site were to come forward on its own.*

The location of the existing gated access to the agricultural land is considered to be in the optimum position”.

Additionally the WSCC report says:

“but the tree belt along the boundary with the A283 will need to be completely removed for safety reasons.”

Thus making the site even more visible from the Downs.

Steypning Parish Council reiterate that extraction and infilling at Ham Farm should not be allowed as it would create an unacceptable impact on landscape character.

3. Water and Flooding:

Wiston Pond and Alderwood Pond are highly sensitive to water levels. The proposed site has watercourses to the west, north and south, which also feed to Alderwood Pond.

50% of the site is susceptible to surface water flooding. As advised by WSCC planning, no hydrological survey has been carried out. One of the reasons that the Rock Common site was rejected was on the basis of a hydrology report. Alderwood Pond is dependent on ditch line water and connecting streams for their fishing business, which would be damaged by pollution. Loss of this business would be a considerable loss of amenity for the community and other users. A representative from Southern Water has stated that water would need to be removed from the site to enable quarrying.

(See appendix 3: Alderwood pond information as provided by Pam Holmes, owner).

4. Deliverability:

The Ham Farm site, as part of Wappingthorn Farm, was designated in a previous application (DC/13/1958) for the internal production of maize and distribution of digestate for the Wappingthorn Farm Anaerobic Digester. The landowner is aware that these are usages of the same land and contravenes the plan as approved.

Steypning Parish Council contends that planning permission granted in July 2014 for the Anaerobic Digester at Wappingthorn Farm was based on the evidence (attached as Appendix 4) submitted by Farm Renewables Ltd and was relied upon by Planning Officers in granting permission. This is all publicly available on the HDC Planning Portal. This evidence clearly shows that permission was granted on the understanding that maize grown on the Farm (including the Ham Farm site) would feed the Digester and that digestate produced would then be spread on the Farm as fertilizer thus creating a sterile area, which may not be used for other purposes. If the fields that are now used for growing maize are instead used for sand extraction then the whole basis for planning permission for the Anaerobic Digester was incorrect, and traffic movements of HGVs on both the B2135 and the A283, which leads to it will increase. This would be an additional increase to that proposed for vehicles servicing the sandpit operation, which is already unacceptable.

The application also says that the key planning and land management guidelines for the area include the need to 'Conserve the rural and remote character of the area by maintaining its generally undeveloped nature' and that Mr F De Boer and Partners desire to develop a low carbon business model that is both environmental and economically sustainable producing green energy that can be used in the local area thereby reducing the carbon footprint of Horsham District. A sandpit, later to be refilled with inert waste brought from out of the County, will deliver the opposite of this. **See appendix 4.**

Steyning Parish Council submit that the borehole tests done by Dudman and the landowner are brought into question as this borehole test is inconsistent with the test done on the same land in 1948 (**see appendix 6**) and Steyning Parish Council question the reliability of this test and submit that WSCC have failed to research the site sufficiently as this earlier testing would have come to light. If the 1948 bore test is to be believed then there are significant deposits of far more valuable blue clay.

Furthermore Dudman has submitted a forecast for extraction of 850000 tonnes of soft sand. WSCC have failed to validate this, as this is inconsistent with the landowner's verbal estimate of 500,000 tonnes. (**See statement in appendix 7**)

Steyning Parish Council believes that the Ham Farm site will not be restored within the time frame, nor is there enough inert local landfill to restore satisfactorily the site within the assured timescale of 10 years. WSCC have confirmed that adjacent sites at Storrington and Washington have not been satisfactorily restored by Dudman Ltd and have far exceeded an acceptable timescale. On that evidence, there can be no assurance that this site will be restored either, despite advice from WSCC planners that the Ham Farm site would be excavated and restored within 10 years.

According to the West Sussex Minerals and Waste Development Framework (May 2011) and the reasoning upon which WSCC rejected a potential site:

"most inert waste in the County is now recycled or re-used, for example, within engineering projects, and the requirement for inert landfill capacity is therefore vastly reduced. Overprovision of inert landfill would not encourage waste up the waste hierarchy, away from disposal to land, and would therefore not fit with the preferred strategy. There is not enough inert landfill available within this County, subsequently out of county landfill will be imported in order to meet the assured time frame of 10 years."

5. Highways and Traffic

The 2015 Highways assessment did not take into consideration the following factors:

Since the Shoreham aircraft crash in Aug 2015, when the A283 became the official diversion route from the A27, traffic volumes on the A283 have increased by an estimated 30% and have not fallen back to their original volume even though the A27 reopened many months ago.

The A283 and the B2135 are well used cycle routes and often used for races in the evenings and at weekends; this causes slow moving traffic on both roads especially when lorries cannot overtake because of the bends, on-coming traffic

and blind summits.

Functions at Wiston House also cause considerable jams on the road.

Road accident statistics show that from April 2011 to March 2016 inclusive on the A283 between and including the Washington Roundabout and the Clays Hill Roundabout, there have been 34 accidents involving injury reported to the Police, categorised as one fatal, ten serious and 23 slight collisions. (Source: Sussex Safer Roads Partnership)

In the 2014 Road Safety Foundation Report 'How Safe are you on Britain's Roads' the A283 is shown as a Medium-High Risk road.

The 2015 consultants' report is considerably different to the 2011 consultants' report. The entrance is to be at the point of the existing farm gate, but sight lines are needed to the north. The existing belt of trees will need to be removed in its entirety to allow drivers turning right to see the bend in the road. This is in conflict with the Draft Minerals plan's stated intention and SDNPA requirement to retain all trees around the perimeter of the site.

Turning right across the A283 (i.e. going from the east towards the west) will need a right hand turn lane if it is not to halt traffic going west. A right hand turn lane was stated to be necessary in the 2011 WSCC Traffic Assessment report as follows:

"Access Works and other Mitigation Works

*Given the nature of the A283, a **right turn lane would be required in order to protect the free flow of traffic and ensure no safety detriment through vehicles waiting to turn. In principle, it would seem that an access with right turn lane could be formed without requiring 3rd party land.***

However the road is narrow at this point so land must be taken from the Wiston Estate, **which is within the South Downs Park.** (See Appendix 5)

"Suggested Routing

*The location of the site would mean that **a routing agreement would not be necessary.***

The 2011 WSCC Traffic Assessment Report says no routing agreement is necessary, so that more pressure is put on air quality in Storrington. This is not sufficiently addressed in the 2015 report.

There is gross inconsistency between the 2015 assessment of 46 two way lorry movements per day with 11.5 hour operating hours and the 2011 report that states 34 daily two way movements with a 6 hourly operating day.

The number of lorry movements has been severely underestimated, as WSCC's assumption that the same lorry will remove sand and bring infill, would appear to be incorrect. This is substantiated by the West Sussex Minerals and Waste Development Framework, May 2011 that states: *"There is not enough inert landfill available within this county, subsequently out of county landfill will be imported in order to meet the assured time frame of 10 years."* Furthermore no allowance has made for additional vehicles such as staff/equipment/maintenance vehicles and Lorries to remove surface water.

Should the Ham Farm site be lost to maize production, additional Lorries would also be required to feed the anaerobic digester, which is currently operating at Wappingthorn Farm.

The 2015 Highways report statistics show that there will be a 26% forecast increase in traffic through natural growth on the A283 from 2015 to 2033. This will exacerbate the existing problems already experienced on the A283. Furthermore, the **speed limit of 60mph is incorrectly stated as being 50mph** in the report and calculations based on this are therefore invalid.

Loaded sand lorries are required to travel at a reduced speed. This has not been accounted for in the plan. The following information confirms the serious highway issues, which are presented by the transport of aggregate by lorries:

“According to the Mineral Industry Research Organisation (MIRO), sustainable aggregates study (1), “Although considerable improvements have been made over recent years, there are still a number of potential off-site effects of this traffic. It can add to the number and size of vehicles on the road, which may cause congestion, accidents or difficulties for pedestrians. It may damage roads, which can give rise to damage to other vehicles or cause accidents. It may damage road verges, which can affect the wildlife often found along roadsides. Lorries may spill or drop material onto roads and spread dust, which can be another source of accidents. Increased traffic can also create visual intrusion, air pollution, dust, noise and possibly vibration in areas adjacent to the roads.”

The ARCDY report states that the roundabout is over theoretical capacity on the A283 Storrington arm in the morning. Therefore traffic issues already exist and will be made worse by the development as proposed. By 2031 this assessment suggests the A24 and A283 Storrington Road will be over capacity. Storrington Road is expected to see an increase of 162 queuing vehicles compared to 2015.

No allowance has been made for the cumulative effect of importing inert landfill from *out of West Sussex* to restore Ham Farm and the existing adjacent Washington and Storrington quarries sites, simultaneously.

The traffic survey which was undertaken, was over 24 hours but did not reflect the very busy times i.e from 7am – 9.30am with commuters, school coaches and parents taking children to school or nursery. Nor the school coaches and school runs from before 3pm- 4.30pm, followed by the “rush hour” traffic from 4.30pm – 7.30pm. All of which cause long tailbacks and reckless driving.

6. Health, well being and loss of amenity:

There will be a detrimental impact on the Health and Well being of residents, which has been fully accepted by WSCC in the report and yet irresponsibly dismissed.

The effects of light pollution from this site has not been addressed, both with regard to the immediate homes adjacent to the proposed site, nor the visitors to the South Downs (view from SDNP) and Steyning village.

The effect of air pollution on the surrounding community has been unacceptably dismissed. One in eleven children have asthma in the UK. According to asthma.org association *"Pollutants, such as the chemicals in traffic fumes, can quickly irritate the airways and trigger asthma symptoms. The tiny particles found in dust, soot, and diesel fumes are small enough to get right into the lungs, causing inflammation and making asthma systems worse"*. On the Horsham Road in close proximity to this site, is a large and active pre-school crèche who are concerned about the effects of noise, light and particulate pollution on their young children. The playing fields of Steyning Grammar School (2000 pupils) are nearby.

Alderwood pond provides recreational fishing facilities and a nature reserve for enjoyment by disabled young people, rehabilitating soldiers and the local community, which will suffer from the affects of air, water and noise pollution.

7. Local economy

The Steyning and District community partnership, which has responsibilities for local economy and tourism, have stated that there would be a severe detrimental effect to the interests of the community by this plan. **WSCC have stated that there will be no effect and this statement was made without any known consultation to any local body.**

8. Bio Diversity

There are obvious biodiversity issues, which include ancient woodlands, bats, newts and the toad crossing *under* the A283. Alderwood Pond was designated a nature reserve and bird sanctuary in 1984. **(See Appendix 8)** This document provides evidence of many land, water and plant species in existence, **which should be protected and have not been considered by WSCC.**

9. Historic environment Listed buildings

Wappingthorn Manor is a listed building, (which WSCC have not considered) and has the benefit of the restrictive covenant mentioned elsewhere. Horsebrook Cottage is also listed and is immediately adjacent to the site on its western boundary. Also adjacent to the site on the east is the house called Hammes Farm

(the original Ham Farm) and associated buildings. Wappingthorn Farm itself contains several listed buildings.

Full cognisance of historical issues has not been fully addressed, such as Roman occupation and the abandoned medieval village of Wappingthorn.

Conclusion:

Steyping Parish Council therefore considers that the process of including the site known as “Ham Farm” in the draft Minerals Plan was fundamentally flawed.

That assessment failed to take into account sufficiently the following:

1. The relevant advice in the NPPF;
2. The damage to the South Downs National Park (“SDNP”);
3. An inaccurate 2015 Highways Report which was at complete variance to the 2011 Highways Report and, in particular, the destruction of a mature belt of trees for a considerable length fronting the A283 to the Wiston bends;
4. The cumulative adverse nature of the other two sandpits further up the A283;
5. The recommendations of the SDNP Landscape Officer;
6. The damage to the amenity of adjoining residents, acknowledged as severe in the WSCC Report;
7. The extent of flooding and damage/pollution to the water courses;
8. The effect of air, noise and light pollution on the health of the community;
9. The harm caused to the local economy;
10. The lack of clean inert material to backfill the sandpit over the alleged ten year period of extraction, without bringing this in from “out of County”;
11. The impact on nearby Grade II Listed Buildings;
12. The designation of the Ham Farm site, as part of Wappingthorn Farm, in a previous application (DC/13/1958) for the internal production of maize and distribution of digestate for the Wappingthorn Farm Anaerobic Digester.

These planning obstacles that directly contravene the strategic objectives set out in the WSCC Minerals Plan are insurmountable, making this site undeliverable.

The Parish Council therefore seeks the removal of the Ham Farm site from the next version of the draft mineral plan.

Steyping Parish Council
June 2016

Appendices:

Appendix 1

Photographic evidence of view from Chanctonbury Hill and other view points from the South Downs.

FROM CHANCTONBURY RING (A)



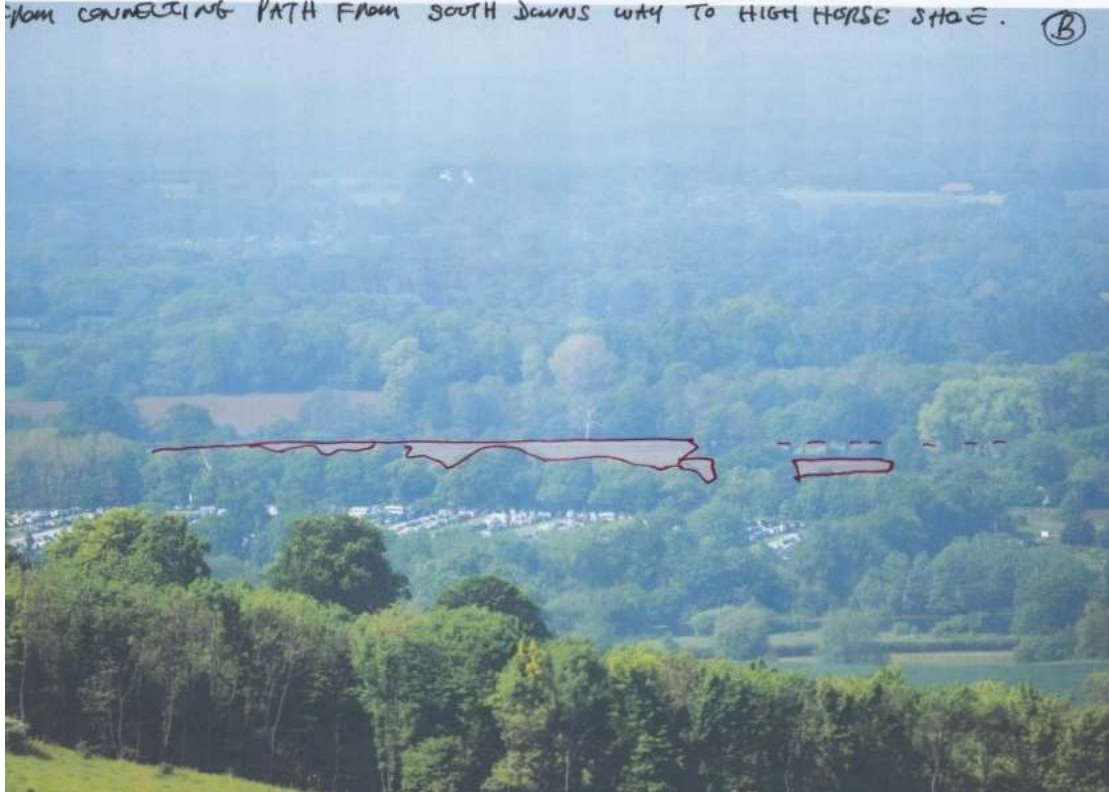
FROM CHANCTONBURY RING (A)



Rock QUARRY. (A) FROM CHANTEM BURY RING



from connecting PATH FROM SOUTH Downs way TO HIGH HORSE SHALE. (B)



FROM HIGH HORSE SHOE NEAR BENCH. (C)



FROM PERMISSIVE FOOTPATH ABOVE TENNIS COURTS ON HIGH HORSE SHOE (D)





Appendix 2:

Existing quarries at Washington and Storrington demonstrating potential for cumulative visual impact if Ham Farm is excavated.



Appendix 3:

Alderwood Pond information notes 31/5/16:

- Alderwood Pond is registered with DEFRA EW033-X-017F

- Risk to migrating trout exist
- Risk to bat species- awaiting survey
- Risk to Crested Newts - awaiting survey
- Ancient Lime tree is present, which is an ancient woodland species.
- Alderwood Pond was put forward as a nature reserve and bird sanctuary in 1984 due to its bio diversity.

Users:

- There are 45 fishing points also known as Swims, including four for disabled use. This is the only fishing pond in the area with disabled access.
- 500 + people use the site each year
- St Dunstons Charity for the blind, 5-6 at a time
- Chailey Heritage for disabled, 5-6 at a time
- Simon York Johnstone - People with learning difficulties
- St Johns
- Rehabilitation for soldiers.

Water levels are a huge concern. Fed from stream and Ditch-line water. They have a licence to extract water from the South Stream.

There is a Covenant attached to the site, which is being investigated.

Appendix 4

Extracts taken from Farm Renewables Planning, Design and Access Statement

Related to a proposed anaerobic digester plant at Wappingthorn Farm dated 11th October 2013

Submitted to HDC as part of application DC/13/1958

Introduction

1.2 This application reflects a desire by F.de Boer & Partners to develop a low carbon business model that is both environmental and economically sustainable producing green energy that can be used in the local area thereby reducing the carbon footprint of Horsham District.

1.7 The farm yard does contain 3 listed buildings all related to the operation of a dairy farm at the site

1.8 The plant will be fuelled by 8760 tonnes of maize silage produced at Wappingthorn Farm and land and on additional land farmed by F.de Boer & Partners.

1.11 The digestate leftover from the digestion process will be used as natural organic fertiliser by F.de Boer & Partners. The majority of land farmed by F.de Boer & Partners is not in a Nitrate Vulnerable Zone (NVZ), but where it is, this will be done in full accordance and compliance with NVZ restrictions on the timing of spreading of digestate to land

2.1.8 The key planning and land management guidelines for the area include:

- *Conserve the rural and remote character of the area by maintaining its generally undeveloped nature*
- *Respect traditional settlement pattern*
- *Avoid the creation of new farm access tracks*

- *Conserve and enhance the existing hedgerow and show network*

9.1.11 All 8760 tonnes of maize silage will be grown on land farmed by F.de Boer & Partners. Of this 4500 tonnes will be grown on land accessible from the farm track network of Wappingthorn Farm.

9.3.10 Current agricultural practice sees Mushroom compost delivered to the farm for spreading on the land on an annual basis, whilst Sewage Cake and Cattle Slurry have both been spread in recent years. This will be replaced with digestate.

9.4.11 Arable land, currently farmed by F.de Boer & Partners, is fertilised with a mixture of 1000 tonnes of spent mushroom compost tonnes and chemical fertilisers. In recent years cattle slurry and Sewage Cake has also been spread on the land. This proposed development will see that replaced with digestate produced by the process.

101 The impact of the proposed development will be minimal on traffic movements, when compared to existing patterns of traffic movement related to the farming activities of F.de Boer & Partners, related to the current operation of a crimped grain production business.

102 The farm currently produces seasonal agricultural vehicular movements related to the production and harvest of crops. In the land around Wappingthorn Farm normal arable production might include the production of 7000 tonnes of crimped grain and 700 tonnes of wheat. These are brought back from the fields to Wappingthorn Farm. Of these 1000 tonnes of crimped grain are produced on land accessible internally through farm tracks.

103 Of the 7000 tonnes of crimped grain produced, 5000 tonnes is almost immediately sold on to local cattle farmers for use as animal feed. Depending on the location this is mainly transported by lorry with some taken by tractor and trailer. The remaining 2000 tonnes is stored over winter and sold on to farmers in the early summer months between May and August.

104 Once harvested, wheat is currently brought back to the site by 12 tonne trailer where it is dried, before being transported to a grain store on a separate site. The grain is then brought back to Wappingthorn Farm for processing, in order that it can be sold on to local farmers, again as an animal feed in the first two or three months of the year.

105 For the production of both the wheat and maize crops 1000 tonnes of spent mushroom compost and 112 tonnes of artificial fertiliser are brought onto the farm and then spread onto the fields. The fertiliser for all of F. de Boer & Partners agricultural activities are delivered to Wappingthorn Farm as there is the space to store the material on a dry concrete base in the yard. In both cases 33% of the material is used on Wappingthorn Farm itself. The remaining 77% is spread on the additional arable land farmed by the company.

106 This proposal sees a move away from the production of animal feeds at Wappingthorn Farm and the wider land farmed by F. de Boer & Partners.

107 The plant will be fed by 8740 tonnes per annum of maize silage.

108 As maize silage uses the whole crop, rather than just the grain, this significantly increases the tonnage that can be produced on site at Wappingthorn Farm. 4500 tonnes of the maize silage feedstock can be produced on land accessible through the farm track network.

109 The further 4260 tonnes of maize silage will be sourced from land outside the farm track network, that is currently used for crimped grain production. This will result in a significant reduction in the land rented by F. de Boer & Partners for the production of maize and a resultant reduction in the traffic required to prepare and

maintain that agricultural land.

- 10.10 Once material has been fed through the digester, it comes out as digestate. This will be produced at a ratio 71% of the material fed into the process. This means there will be 6390 tonnes of digestate produced, per annum. The digestate will be separated into a solid and liquid fraction.

This means there will be 5490 tonnes of liquid digestate and 900 tonnes of solid digestate. These are both odour free when spread. They will be spread at a maximum rate of 29 tonnes per acre comprising an application of solid digestate either in autumn or spring, and several applications of liquid digestate throughout the year. This will result in 275 vehicle movements to spread liquid digestate on land external to Wappingthorn Farm and 45 for the solid fraction.

- 10.12 The table above shows that this development will lead to a significant decrease in traffic movements caused by the agricultural activity at Wappingthorn Farm. This is largely caused by the simplification of the processing required for the maize that is grown and the fact that it will no longer be sold off-site to livestock farmers.

- 10.13 This reduction in lawful movements will reduce pressure on the junction formed by the driveway with Wappingthorn Farm track onto Horsham Road. This comes in the centre of a double bend in a 60mph limit stretch of road. A reduction in its use will improve the conditions.

Later letter from Farm Renewables re traffic movements:

7th November 2013

The move to a business model focused around Anaerobic
mean Wheat and Maize grain is no longer processed and exported off-site
from this location. The farm's existing crop storage infra-structure will all be
used for silage storage which will then be fed into the digester.

PC 11/3/1958

It should also be noted that feed stock for the digester will be brought in by tractor and trailer, where coming from the additional local land farmed by F. De Boer & Partners. This will be instead of the articulated Lorries which bring grain maize and wheat onto site and then some time later once processing is complete, distribute it to end markets.

This will in turn significantly reduce pressure on the entrance to the farm from Horsham Road. It will result in a reduction in the lawful use of the farm entrance by the farm's owner. It will under no circumstances lead to an operational situation where vehicles are making constant deliveries to site 24 hours a day, seven days a week through-out the year.

Extract from Planning Officers report to Planning Committee on consideration of DC/13/1958

- 1. To show that that planning permission was given on the understanding that the maize to feed the digester was produced on-site:**

There is an intrinsic link between this form of renewable energy technology and the subsisting agricultural use of Wappingthorn Farm – the form of renewable technology being proposed here, relies on the consumption of arable feedstock, such as the maize already grown at Wappingthorn.

Consequently, the sustainable location of the proposed anaerobic digestion plant is

considered to be wholly satisfactory in this regard.

2. **To show that that planning permission was given on the understanding that traffic movements on the B2135 would reduce as maize and digestate would both be moved within the farm:**

The access to the site from the Horsham Road has also been raised as a concern by many local residents, and understandably this is on the basis of the existing inadequate road junction. West Sussex County Highway Engineers have been on-site, assessed the application details, and have not raised an objection on the overall reduction in vehicle movements.

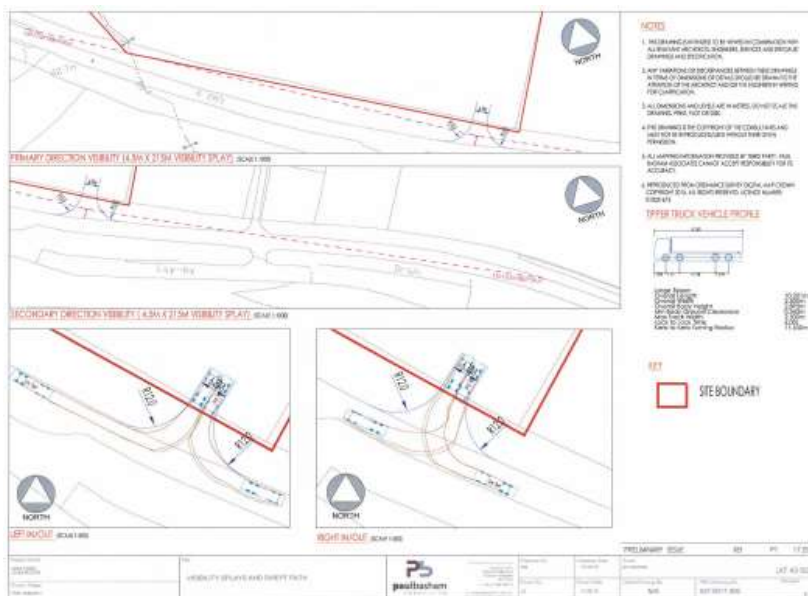
The applicant has submitted a traffic report that considers the existing farm activities against the proposed farm activities associated with the running of this plant.

A road traffic audit has been produced by the applicant to verify the initial report, and both have been carefully assessed by the County highway engineers.

The result of this assessment is that there is agreement between officers, the highway engineers, and the applicant, that vehicle movement will decrease by the sum of approximately 300 movements per year.

On the basis that the junction will be used less as a result of the proposed development, despite its inadequate geometry and visibility splays there is no evidential basis for a refusal on this ground.

Appendix 5:



Appendix 6:

Duke and Ockenden Bore

Bore Hole Test March 1948

6/10/2016 Page 2 | Borehole TQ115E96 | Borehole Logs

USE W.L. 2000/1000 FOR 7/10 (11) F.M.

RECORD OF WELL (SHAFT OR BORE)

At HAM FARM
 Town or Village STEYNING
 County SUSSEX Six-inch quarter sheet L1 NE/W
 For Mr. WISTON ESTATE
 Exact site of well 50 yds NE of Wiston House
200 ft S of Farm Buildings See Sketch

Level of ground surface +10' If well top is not at ground level, state how far above; below; ft.
 above sea level (O.D.) 100' approx.

SHAFT _____ ft.; diameter _____ ft. Details of headings _____

BORE 125 ft.; diameter of bore: at top 6 ins.; at bottom 4 ins. Lengths diameters, perforations, etc., of lining tubes 6" ID Surface to 100'
4" perforated & gauge covered from 105' to 125'
 Water struck at depths, below well top, of (least) about 100'
 Rest-level of water 20 ft. above well-top. Section at 72 ft. Yield on 8 hours' pumping 360 gal. per hour with depression to 72 ft. below well-top. Capacity of pump 400 g.p.h. Recovery to rest level in _____ mins. Date of measurements March 1948 Date of well March 1948
 Quality of water (attach copy of analysis if available)
 Well made by Duke & Ockenden Ltd
 Information from DUKE & OCKENDEN, LTD LONDON AND LITTLEHAMPTON

Additional notes in space overleaf.

GEOLOGICAL CLASSIFICATION	NATURE OF STRATA	THICKNESS		DEPTH	
		Feet	Ins.	Feet	Ins.
	If measurements start below ground surface, e.g., from bottom of an existing shaft, state how far				
2-8	Soil	1	6	1	6
6	Brown Clay & Gravel	6	6	8	0
	Clay (Chocolate Colour)	2	0	10	0
	Blue clay	50	0	60	0
	Grey Sandy clay	30	0	90	0
	Dark Brown Sandstone	5	0	95	0
	Light Brown Sandstone	2	0	97	0
	Sandy Clay	4	0	101	0
	Dark Brown Sand	4	0	105	0
	Grey Sand	20	0	125	0
12-14	Analysis				
	Total Solids	14.0			
	Chlorine	1.6			
	Ammonia	0.0019			
	Chlorine & Ammonia	0.0006			
	Iron	0.0001			
	Total hardness (Calcium)	9.6			
	Calcium over test				

Geological Survey and Museum, SOUTH KENSINGTON, LONDON, S.W.7

Date received 26.5.48 Correspondence File No. 318 1" N.S. Map En 1" N.S. Map En Five marked locations on 1" Map 0 on 6" Map 0

Appendix 7:

As per the Steyning Parish Council notes, recorded at the meeting with WSCC planners and members of the Steyning Quarry Action Group 1.6.16, a local resident stated " I met with Frans DeBoer last week and he has stated that there is a capacity of 500000 tonnes, not 850000". Mr F Deboer is the landowner.

Appendix 8:

Nature Reserve and Bird Sanctuary Document:

- 3 -

be planted with oaks. It is suggested these should be protected by the new clear plastic tubes which both protect the plant and act as a miniature greenhouse. This method has not yet been approved but looks very promising.

14 Alder. No action.

PLANTATIONS

(Areas 1,3,10,11,12,15)

The conversion of the plantations back to broadleaved woodland will require a lot of work and of necessity take a long time. Management while constantly aiming at this is also designed to allow for some commercial gain when the opportunities arise. At present, however, there is no market for the smaller softwoods, even for wood pulp.

1 Conifers with oaks. Oak has been planted in every 4th row. Both require about $\frac{1}{2}$ thinning and additional conifers should be cleared around the oaks to give them sufficient light. Further clearing to produce a glade would be beneficial.

3 Conifers with oaks. The conifers require about $\frac{1}{2}$ thinning and should be cleared around the oaks. Again a glade could be created.

10 Conifers. These require about $\frac{1}{2}$ thinning.

11 Poplars. No immediate action is necessary but they will require cropping or thinning later. The trees could be underplanted with shrubs - hawthorn, blackthorn, hazel, holly, guelder rose - to improve the structure in the longer term. As the canopy is opened up oak could be planted - ash will probably establish itself.

12 Conifers, with hazel-ash along the ditch in the middle. The conifers require $\frac{1}{2}$ thinning.

15 Conifers. Clear around broadleaved trees and shrubs.

These policies and prescriptions should be adequate for a 15 year period, however it should be realised that amendments might be required in the light of experience.

J. G. Stewart
Conservation Officer
Sussex Trust for Nature
Conservation

9th September 1982.

Objects of Management

Primary broadleaved woodland is the richest type of habitat to be found in Britain. Unfortunately much has been lost (nearly 50% in the last 30 years in the country as a whole), therefore the conservation of the remaining examples is of the greatest importance.

Great Alder Wood is probably an 'ancient' wood and the broadleaved parts are suitably varied in species. Objects of management, therefore, are:-

1. To maintain and enhance the existing areas of native broadleaved woodland and associated features such as rides and glades.
2. Progressively to return the areas of coniferous plantations back to broadleaved woodland.

Management Prescriptions

These can be divided into two main parts:-

BROADLEAVED WOODLAND

(Areas 2,4,5,6,7,8,9,13,14, on map)

For the most part the policy should be one of no action at the moment for most of these areas can continue without any interference. Some work, however, is required to maintain glades and the ride (of great benefit to insects, particularly butterflies and birds), to control sycamore which is not a native species and is very invasive, and to take out some conifers.

2, 4, 9, Oak-hazel-ash. No action.

5 Oak-hazel-ash. Remove conifers.

6 Glade. This should be maintained by occasional coppicing of the shrubs (a little each year so that it is all covered about every 5 years) and the clearance of bramble and tall herbs. This should be done in autumn and winter; cut material is probably best burnt. Remove surrounding conifers.

7 Alder. Remove adjacent conifers.

8 Ride. This should have structured sides - low herbs in the middle, gradually stepping up through tall herbs and scrub to each side. The middle, therefore, should be cleared regularly, the tall herbs on each side in alternate years, and the shrubs coppiced about every seven years, part each year on a rotational basis. This work should be done in autumn and winter.

9 Oak-hazel-ash. This area also contains a lot of sycamore. The immediate aim should be to prevent the further establishment of this species by uprooting seedlings and cutting saplings. Cut stumps should be treated with either Bruchwoodkiller or Amcide diluted in paraffin. Attention should then be turned to the large specimens (the source of much the seed) which should be felled. Cut stumps should be treated. Any area thus cleared could

be planted with oaks. It is suggested these should be protected by the new clear plastic tubes which both protect the plant and act as a miniature greenhouse. This method has not yet been approved but looks very promising.

14 Alder. No action.

PLANTATIONS

(Areas 1,3,10,11,12,15)

The conversion of the plantations back to broadleaved woodland will require a lot of work and of necessity take a long time. Management while constantly aiming at this is also designed to allow for some commercial gain when the opportunities arise. At present, however, there is no market for the smaller softwoods, even for wood pulp.

1 Conifers with oaks. Oak has been planted in every 4th row. Both require about $\frac{1}{2}$ thinning and additional conifers should be cleared around the oaks to give them sufficient light. Further clearing to produce a glade would be beneficial.

3 Conifers with oaks. The conifers require about $\frac{1}{2}$ thinning and should be cleared around the oaks. Again a glade could be created.

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12 Conifers, with hazel-ash along the ditch in the middle. The conifers require $\frac{1}{2}$ thinning.

15 Conifer.. Clear around broadleaved trees and shrubs.

These policies and prescriptions should be adequate for a 15 year period, however it should be realised that amendments might be required in the light of experience.

J. G. Stewart
Conservation Officer
Sussex Trust for Nature
Conservation

9th September 1982.

BIRD COUNT 1978/84.BIRDS NESTING.

KESTREL.
RED-LEGGED PARTRIDGE.
KALLARD.
SPARROWHAWK.
PHEASANT.
MOORHEN.
LAPWING.
WOODCOCK.
WOOD PIGEON.
COLLARED DOVE.
CUCKOO.
TAWNY OWL.
GREEN WOODPECKER.
GREAT SPOTTED WOODPECKER.
SKYLARK.
SWALLOW.
CARRION CROW.
JACKDAW.
MAGPIE.
JAY.
GREAT TIT.
BLUE TIT.
COAL TIT.
WILLOW TIT.
LONG-TAILED TIT.
NUTHATCH.
TREECREEPER.
JEN.
MISTLE THRUSH.
SONG THRUSH.
BLACKBIRD.
ROBIN.
BLACKCAP.
CHIFFCHAFF.
GOLDCREST.

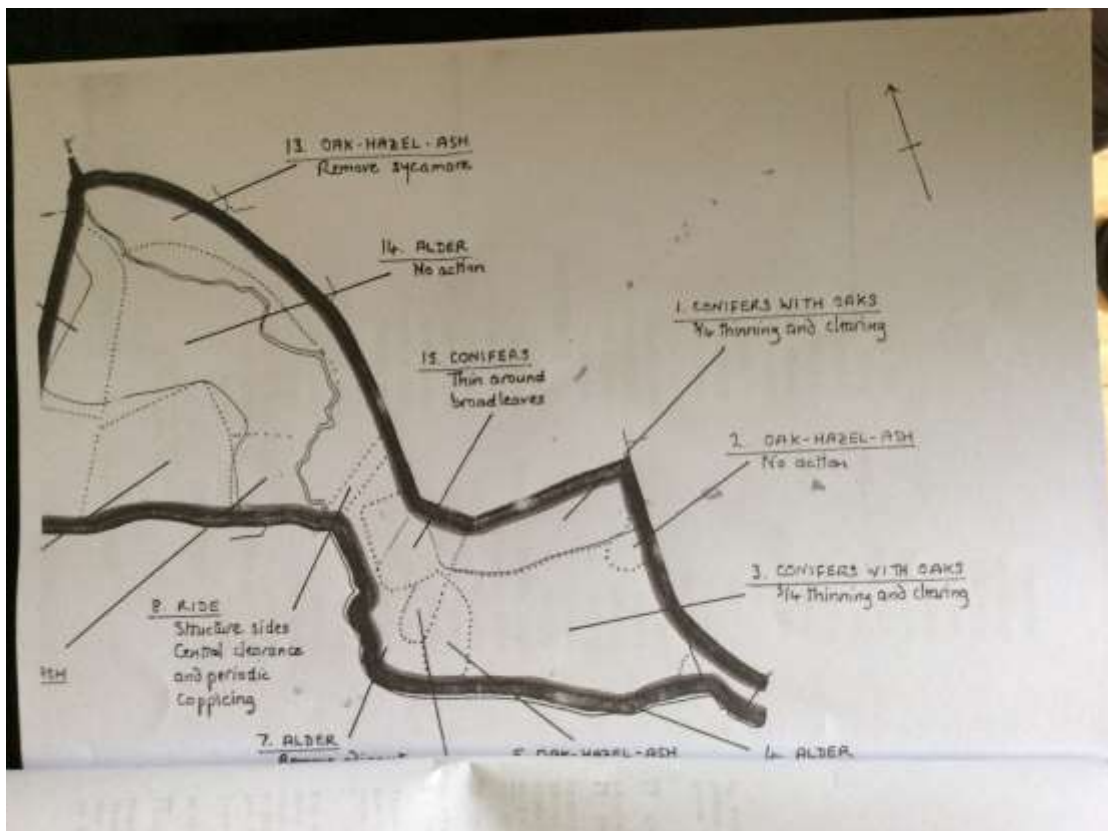
DUNOCK.
MEADOW PIPIT.
PIED WISTAIL.
STARLING.
GREENFINCH.
BULLFINCH.
CHAFFINCH.
REED BUNTING.
HOUSE SPARROW.
TREE SPARROW.
NIGHTINGALE.
NIGHTJAR.
STOCK DOVE.
LITTLE OWL.

VISITING BIRDS.

GREY HERON.
HERRING GULL.
KINGFISHER.
SAND MARTIN.
ROOK.
FIELDFARE.
REIWING.
HAWFINCH.
GOLDFINCH.
TUFTED DUCK.
POCHARD.
PARTRIDGE.
SNIFE.
BARN OWL.

WILD LIFE COUNT 1970/84 .

FOX.
ROE DEER.
RABBIT.
STOAT.
WEASEL.
GREY SQUIRREL.
VOLES.
HEDGEHOG.
VOLE.
MUNJAC DEER.



TREE COUNT 1976/77.	
POPLAR (LOMBARDY).	SILVER FIR.
POPLAR (BALDAR).	RED CEDAR. (DOUGLASS).
OAK (WILLOW).	ASH.
FIELD MAPLE.	WESTERN HEMLOCK.
SILVER BIRCH.	ASPEEN.
SMALL LEAVED LIME.	WILLOW. (GOAT).
HAWTHORN.	WILLINGHAMIA.
GRAB APPLE.	SUNRAY SPEECH.
HOLLY.	LARCH. JAPANESE.
ELDER.	STACHER.
BLACKTHORN.	ROCKS PINE.
CHERRY.	ALDER.
CHESTNUT (SPANISH).	POPLAR (BLACK).
CHESTNUT (HORSE).	ENGLISH OAK. (VENERGOLATE).
	CORSIAN PINE.
	ENGLISH OAK. (SERRILE).
CLIMBERS.	
IVY.	
OLD MAN'S BEARD.	
HONEYUCKLE.	

WILD FLOWER COUNT 1978/84.

SNOWDROP.	GREATER STITCHWORT.	SANICHO.
DOGS MERCURY.	LESSER " "	BINDTREW.
FUSSY WILLOW (SHRUB)	RAUNOON.	GREYER ROSE.
CHICKWEED.	SPRINGWILL. (VARIOUS)	ANCHORAGE.
STITCHWART.	SLIPWILL.	WOUNDWORT.
SHEPERDS PURSE.	WIGGLE.	STINGING NETTLE.
GRASSWIGGLE.	STONKESWILL.	WILD PANSY.
RED DEADNETTLE.	FORGET ME NOT.	DEWBERRY.
SPOTTED DEADNETTLE.	DOG DAISY.	BLACKBERRY.
WHITE DEADNETTLE.	SAVING.	BRIDGEMAN DROWN.
DAISY.	RED CAMPION.	NOONWEE.
CAMPFOOT.	MARSH MARIKOLD.	GOOSE GRASS.
GLOE (BLACKTHORN).	BURN VETCH.	HEMLOCK.
LESSER CELANDINE.	MARSH ROBERT.	BROADLEAF DOCK.
PERIWINKLE (2 VARIETIES)	LADY'S MANTLE.	YARROW.
VIOLET.	MAYFAIR.	CLARY.
PRIMROSE.	HOWAN.	GREEN PLANTAIN.
IVY.	HEDGE MUSTARD.	LESSER SPURWORT.
LADY'S SHOCK.	PIGTO.	COMMON MALLOW.
DAFFODIL.	CRANESBILL.	CATS EAR.
STINKING IRIS (GLADON)	HERB BENNETT.	DOG ROSE.
WOOD SORREL.	WINDSPOT TURFOIL.	IRIS.
WOOD ANEMONE (WILDFLOWER).	CUCKOO PIST.	THISTLES (VARIOUS)
BUTTERCUP.	COMFREY.	WILLOWHERB.
COUSLIP.	YELLOW PIMPERNEL.	WATER PEPPER.
DAUNDELION.	RED " "	BULBUSH.
GRASS IVY.	CROWFOOT.	HIMP NETTLE.
DOG VIOLET.	STARWORT.	HONEYBUCKLE.
WILD STRAWBERRY.	PEARLWORT.	MARSH WOUNDWORT.
RAUNOONULAS.	SILVERWEE.	WATER DOCK.
TOM HALL CLOCK (ADOXA)	HOP TRIFOIL.	DEVILS BIT SCABIOUS.
RAGWORTS.	WHITE CAMPION.	
RAPE.	CUT-LEAF CRANESBILL.	
COW PARSLEY.	WOODY NIGHTSHADE.	
SUN SPURGE.	BLACK MEDICK.	
WOOD SPURGE.	SHEPERDS PURSE.	
GARLIC MUSTARD.	RIBWORT.	

GREAT ALDER WOOD.

SCHEDULE No.4.

STREAM FISH 1984.

BROWN TROUT.

POND FISH (INTENDED).

CAMP.

TEICH.

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3. Asthma UK. Asthma facts and FAQs. <http://www.asthma.org.uk/asthma-facts-and-statistics> Website accessed 3 January 2014.