

PRE-APP ADVICE REPORT - NC/26/0021 - WSCC/004/26

Description:

Proposed importation of inert restoration materials and reprofiling to provide an attenuation layer to mitigate the impact of climate change by improving long term sustainable management of leachate, temporary diversion of FP2774 and nature conservation, biodiversity and landscape improvements.

Officer Notes:

This consultation relates Cemex Small Dole Landfill, a historic landfill site which has previously been restored. The proposal seeks to import 500,000m³ of inert material to reprofile the site to support the long term management of leachate.

It is noted that the council has previously provided a Neighbouring Authority consultation providing comments in regard to the principal of development, Traffic / network capacity, Land contamination / Imported materials Noise, Air Quality, Restoration and Aftercare

The Council has been reconsulted following the submission of further information in respect of ecology, public rights of way, highways, flooding and drainage, air quality, noise and other consultation responses.

Advice Letter Content:

Noise

The Councils Environmental Health team have reviewed the submitted Technical Note provided by WBM Acoustic Consultants dated 21 April 2026.

The officer notes that two principal concerns were previously raised

- Noise generated by tonal reversing alarms
- Impacts of noise from site operations on residents of New Hall Lane

The Technical note confirms that all mobile plant and vehicles at the site will use broadband/white noise reversing alarms only.

This will reduce the noise associated with mobile plant movements and I would recommend that use of broadband/white noise reversing alarms is secured through condition.

The technical note also provides a more detailed commentary on the noise impacts on residents in New Hall Lane, arguing that the ambient noise level is higher than the background noise level and therefore this will mask the site noise. However the ambient noise climate does not currently include noise from mobile plant which is likely to be acoustically distinctive from other ambient sounds. The assessment methodology used in Environmental Statement is BS4142:2014. In this standard the assessment of impact is based on the difference between the calculated rating level for site activities and background noise level and so this concern remains. However, if the site works follow the guidance in BS:5228:2009 Code of Practice for Noise and Vibration control on construction and open sites these noise impacts would be effectively controlled. Appendix E.5 to this standard recommends that for construction works involving long-term substantial earth moving, a limit of 55 dB LAeq, 1 h is adopted for daytime construction noise.

If the application is approved the HDC Environmental Health Team recommend that a condition requiring a construction environment management plan (CEMP) is provided:

- 1. The development hereby approved, including demolition, shall not commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the following relevant measures for both demolition and construction phase*

- i. An introduction consisting of a demolition and construction phase environmental management plan, definitions and abbreviations and project description and location;
- ii. A description of management responsibilities including complaint recording and management and provision of suitable contact information on the site boundary
- iii. A description of the demolition and construction programme which identifies activities likely to cause high levels of noise or dust;
- iv. Site working hours and a named person for residents to contact;
- v. Detailed Site logistics arrangements including provision of a suitable booking system for HGV deliveries;
- vi. Details regarding parking, deliveries, and storage;
- vii. A scheme of dust and noise mitigation measures to be deployed including identification of sensitive receptors and a scheme of ongoing monitoring and reporting of noise and dust impacts. The scheme shall be developed by suitably qualified persons and shall include suitable targets and management actions in accordance with BS5228 Code of Practice for Noise and Vibration control and the IAQM Assessment of dust from demolition and construction (2024 V2.2) and provision of quarterly monitoring results to the Local Planning Authority until such point the Local Planning Authority agrees this is no longer necessary
- viii. Details of hours of work, site delivery hours and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network; and
- ix. Communication procedures with the Local Planning Authority and local community regarding key construction issues – newsletters, fliers etc.

The site activities shall thereafter be carried out in accordance with the details and measures approved in the CEMP for the related phase, unless the written consent of the Local Planning Authority is received for any variation.

Air Quality

The updated details have been reviewed by the councils Environmental Health Team (Air Quality) who have provided the following comment:

'The EFT and damage cost calculations appear to be inaccurate. The EFT should generate results for each of the first five years of the site being operational, and these annual figures should then be entered into the Damage Cost Toolkit (Excel spreadsheet available via <https://www.gov.uk/government/publications/assess-air-quality-impacts>).

Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at a higher total cost. When completing the damage-cost calculation, the price base year should be 2026, rather than 2025, as this is the year of appraisal. Please could you review your figures using the above methodology and submit a new damage-cost, including a breakdown of your workings as supporting evidence?

For clarity, these are the figures I used for the EFT and Damage Cost toolkit:

- Start year = 2026
- End year = 2030
- Price base year = 2026 (baseline year for the project appraisal)

Having reviewed the submitted information, we agree that continuous dust monitoring is not required in this instance, and that regular visual dust monitoring and identifying and monitoring the intensity of potential dust generating activities will be sufficient.

The embedded mitigation measures set out in Chapter 9 of the Environmental Statement (Vol 2) are considered sufficient. However, given the increasing frequency of extreme weather conditions,

including prolonged dry periods, heatwaves and strong winds, the applicant should demonstrate how dust control measures would be adapted during such events.

Condition: *The dust mitigation measures set out in Chapter 9 (Air Quality and Dust) of the Environmental Statement (Volume 2) shall be implemented and maintained throughout the importation and restoration phases of the development. Regular visual inspections shall be undertaken to identify dust emissions and assess the effectiveness of the mitigation measures. Where dust emissions are observed, or where weather conditions increase the risk of dust generation, appropriate corrective measures shall be implemented without delay.*

During periods of prolonged dry weather, high temperatures or strong winds, dust suppression measures shall be enhanced as necessary to prevent off-site dust impacts. A sufficient water supply shall be maintained on site at all times for dust suppression purposes.

Reason: *To protect the amenity of the surrounding area and minimise dust emissions during the construction, importation and restoration phases of the development.'*

Landscape

The Council's Landscape Officer has provided an updated comment which can be read in full under 'APPENDIX 1 – LANDSCAPE COMMENT' at the bottom of this report.

Case Officer sign/initial Sam Whitehouse Date: 20/08/2026

Authorising Officer sign/initial J Hawkes Date: 20.08.2026

APPENDIX 1 – LANDSCAPE COMMENT



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Cemex Small Dole Landfill Henfield Road Small Dole BN5 9XJ
DESCRIPTION:	Proposed importation of inert restoration materials and reprofiling to provide an attenuation layer to mitigate the impact of climate change by improving long term sustainable management of leachate, temporary diversion of FP2774 and nature conservation, biodiversity and landscape improvements.
REFERENCE:	NC/26/0002 – Comments in black NC/26/0021 – Comments in blue
RECOMMENDATION:	Holding objection / Advice / Modification Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

[NC/26/0021](#)

Many of our previous comments have been addressed, with thanks. Minor modification is requested, however, in regard to the Planting Schedule. Given the additional planting proposed, quantities should be updated accordingly. See further details below.

NC/26/0002

It is our judgement that the method proposed is over engineered and results in an excessive quantity of material and thus imposing form. Alternative measures must be explored in order to ensure the development assimilates naturally within the landscape.

Further, the generated HGV movements and operational activity for a substantial amount of time will lead to a significant increase in the overall level of activity to the countryside location. This, along with incurred pollution, will diminish the tranquillity, sense of place and rural qualities currently experienced within the area.

The proposed mitigation is insufficient in reducing adverse effects on the receiving landscape and visual context and we consider that there is opportunity to deliver a landscape led scheme that delivers on the objectives of the proposals with significantly less adverse effects. Please see advice below.

MAIN COMMENTS:

1. Please note that we are unable to provide detailed site analysis or an LVIA assessment/rebuttal at this stage.
2. We note, however, that appendix 8.3 (viewpoint photographs) do not appear to have been provided.
[These have now been provided, with thanks. Closed.](#)
3. In any case, it is regrettable that alternative, less intensive measures haven't been explored. We strongly recommend that phytoremediation is considered in full, either as a complete alternative to capping or as an additional measure so as to reduce the proposed HGV movements, length of operational activity and incurred pollution. Phytoremediation is highly likely to be successful in this location and a more efficient and effective method of remediation than currently proposed.
4. Further, a sensitively designed phytoremediation scheme would give rise to additional beneficial ecological, landscape and visual effects and thus would be more successful at mitigation.
[Justification and clarification is noted regarding points 3 & 4, with thanks. Closed.](#)
5. We also strongly recommend that herbicides, including glyphosate, are not to be applied at any time due to impacts on existing and proposed ecological features, and particularly given the proximity of the Adur. Alternative methods for weeding should be considered such as hot foam systems, hot water systems, or electronic control systems. Please refer to pan-uk.org for guidance and [resources](#). The documentation should be amended accordingly to remove mention of herbicides and reflect alternative methods as above or hand weeding alone by careful digging or selective scything.
[Not addressed; herbicide, including glyphosate, remains proposed. Its removal is continued to be recommended in this location, and it is hoped that this is considered. Closed.](#)
6. Three blocks of Willow and Alder woodland planting are welcomed, however we consider there to be scope for this to extend alongside the entire length of the Adur within the red line boundary. This is in order to provide ecological connectivity, further remediation, and to mitigate visual effects, softening the appearance of development from the PRoW network.
[Willow and Alder blocks have been extended as requested, with thanks. However, the planting schedule detailing quantities remains unchanged. Please amend.](#)
7. Furthermore, to increase mitigation benefits, this planting should be implemented as advance planting, to also reduce some adverse effects during the construction period.
[Advance planting is noted to be acceptable, with thanks. Closed.](#)
8. Planting of *Populus nigra* var *betulifolia* is welcomed in particular, and we recommend its proportion is increased within the wet woodland mix.
[As per point 6, the updated Planting Schedule is unchanged from that previously provided. Please amend.](#)

RECOMMENDED CONDITIONS:

If you're minded to recommend the application for approval without the concerns addressed above the following details must be secured by condition:

Advanced Planting

Pre-Commencement (Slab Level) Condition: No development above slab level of any part of the development hereby permitted shall take place until areas of structural and mitigation vegetation suitable for advance planting are identified, submitted to and approved in writing by the Local Planning Authority. These are likely to include wet woodland planting along the full length of the Adur within the

red line boundary. Confirmation of the delivery of these landscape works shall be submitted to and approved, in writing, by the Local Planning Authority.

Reason: To ensure identified adverse visual effects are satisfactorily mitigated, including during construction, and in the interests of visual amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Landscape Management and Maintenance Plan

Pre-Occupation Condition: No part of the development hereby permitted shall be occupied until a Landscape Management and Maintenance Plan (LMMP) has been submitted to and approved in writing by the Local Planning Authority. The details should apply to all landscape areas and shall include:

- Long term design objectives
- Management responsibilities
- A description of landscape components
- Management prescriptions
- Maintenance schedules
- Accompanying plan delineating areas of responsibility

The landscape areas shall thereafter be managed and maintained in accordance with the approved details unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure a satisfactory development and in the interests of visual amenity and nature conservation in accordance with Policy 33 of the Horsham District Planning Framework (2015).

[Recommended conditions unchanged.](#)

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	12/03/2026 17/08/2026 (Informal comments)
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	13/03/2026