



**Horsham
District
Council**

Chris Bartlett
West Sussex County Council
County Hall
Chichester
PO19 1RH

Our ref: NC/26/0002
Your ref: WSCC/004/26
Email: planning@horsham.gov.uk
Direct Line: 01403 215206
If Calling Please ask for: Sam Whitehouse
Date: 5th March 2026

Dear Sir/Madam,

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.

Cemex Small Dole Landfill Henfield Road Small Dole BN5 9XJ

I refer to the consultation received in this office on 16th January 2026 concerning the above site.

Horsham District Council have the following comments:

Principle and Environmental Impacts

The site is located within a highly sensitive area adjacent to the River Adur along the western boundary and within the River Adur floodplain and with wider connectivity to Bramber Brooks to the south.

Given the sensitivity of the site, Horsham District Council and local members have concerns regarding the potential for pollution of Leachate into the Adur. Therefore, HDC welcomes works to manage this risk where they are required, appropriate in scale, which would be delivered / managed effectively. Pollution and any resulting environmental harm remains a core priority.

WSCC Officers should be satisfied that the proposal works are appropriate to achieve the desired outcome, i.e. providing a long term and sustainable solution to leachate / pollutant management. Officers should also be satisfied that any temporary risk of pollution, via disturbance to existing deposited waste, can be satisfactorily managed during period of works themselves, including and risks of surface water run off.

The proposal requires the importation of 500,000m³ of inert material, (equating to a mass of approximately 960,000 tonnes) which would be imported over a period of 6-8 years. This is substantial quantum of material. Officers at WSCC should therefore be satisfied that this is the minimum the quantum of material required to achieve the restoration of the site and address long term management of leachate.

Traffic / network capacity

The proposal would result in some 40 HGV per day, equating to 5 HGV movements per hour during operational hours for a period of 6-8 years.

HGVs are proposed to be routed south via the A283 / A2037 before presumably passing through the Steyning Bypass or Shoreham bypass. It is noted that this would require routing along the A2037 to the South of Upper Beeding. In the interest of residential amenity, it is requested routing and overall HGV movement numbers are secured via condition. This should where practicable, restrict passing HGVs movement within settlement centres, including Small Dole, Oreham Common, Henfield and Cowfold which fall along the A2037 to the north.

The Highways Authority should be consulted regarding matters of Highways Safety and network capacity.

Land contamination / Imported materials

Whilst it is noted that the proposal seeks to make use of inert restoration material, the local authority has a duty to prevent land within its boundary from becoming contaminated land for the purpose of Part IIA of the Environmental Protection Act 1990. Therefore, it is important that only clean inert materials are imported to site. A condition is recommended to ensure that this is achieved:

No soils shall be imported or re-used within the development site until the developer has submitted details of the chemical testing and assessment of all imported soils which demonstrates the suitability of the soils for the proposed use. The assessments shall be undertaken by a suitably qualified and competent person and full details shall be submitted to and approved in writing by the local planning authority.

Noise

The proposal has been reviewed by HDC's Environmental health Officer who has provided the following comment:

The assessment provided in Chapter 10 of the Environmental Statement has concluded that, subject to provision of 3m bund to the northern, eastern and western boundaries of the site, there should be no adverse noise impacts on the identified noise sensitive receptors.

The impacts have been assessed using the methodology given in BS4142:2014 "Methods for Rating and Assessing industrial and commercial sound" to derive specimen 1 hour averaged noise values. It is not clear why this approach has been adopted over the guidance within BS 5228-1:2009+A1:2014 "Code of practice for noise and vibration control on construction and open sites – Noise"

The modelling detailed in BS4142 procedures makes assumptions about a number of variables, including plant noise levels, duration of different activities with the 1-hour period and the presence of distinctive acoustic characteristics such as tones or low frequency components in the noise sources.

Due to the distance to the noise receptors section 10.67 of the Environmental Statement comments as follows:

"At a distance, noise from the type of works and machinery proposed for this site does not usually contain a distinguishable tone nor does it tend to be impulsive. Considering the existing ambient and background sound environment in the area and the magnitude of noise calculated from site operations, an acoustic feature correction is not considered appropriate in this case."

Further justification is required to support this statement. The noise from the type of diesel engine powered heavy plant and machinery involved in these works is known to have a strong low frequency component. In addition, this equipment will be fitted with reversing alarms, and these tonal alarms can be particularly intrusive on a site where earthmoving equipment is working continuously in an area with low ambient noise levels. Full details of the BS4142 calculations should be provided.

The chapter identifies that for receptors in New Hall Lane, noise levels are predicted to be 6dB above the background noise level during the soil stripping works and preparation of bunds in the closest the dwellings. In an area way from other noise sources such as road traffic the impact of this noise is likely to be subjectively more intrusive to residents than suggested.

The adoption additional mitigation measures such as fitting mobile plant and vehicles with broadband (white noise alarms) should be implemented.

Air Quality

The proposal has been reviewed by HDC's Air Quality officer who has noted that, as a major development, the proposal is required to provide an air quality assessment and an emissions mitigation statement, which must include a damage cost calculation. This is set out within the Sussex Air (2021) Air Quality and Emissions Mitigation Guidance for Sussex. The mitigation measures for the proposed development should be in line with this guidance.

The officer has provided the following guidance:

It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to the value from Emissions calculation and total calculated value of emissions' health damage cost. Sussex Air quality guidance aims to avoid the duplication of measures that would normally be required through other regimes.

The monitoring data for 2024 is available to include in the report, however using the 2023 data can be a more conservative approach, as the concentrations were higher. This is approach is acceptable.

The Euro classes of the fleet vehicles have been noted. Could more detail be provided on the NRMM, i.e. number of bulldozers and dump trucks, and their emission stages?

We note the reference throughout to Guidance on the Assessment of Mineral Dust Impacts for Planning. This is currently under full review to address gaps including PM2.5, health impacts, and modern monitoring approaches. In light of this, the applicant should expand the assessment to include and commit to on site monitoring of both PM10 and PM2.5 to ensure impacts are properly characterised and mitigation can be validated.

In addition to this guidance, the Guidance on the assessment of dust from demolition and construction would also be relevant as this development would be covered under "Earthworks". The mitigation from this guidance is largely similar to the aforementioned guidance, but there are some additional measures that could be considered as they are relevant to the site e.g. display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary.

The officer has additionally requested a Construction and Environmental Management Plan (CEMP) be secured via condition.

Landscape Impact

It is noted that the proposal would result in significant land forming with the potential for Landscape impact. The Council's Landscape officer has been consulted with comments to follow.

Restoration and Aftercare

It is noted that proposal includes site restoration and aftercare, including planting, hedgerow and amenity grassland. Given the scope of the works, the proposal presents substantial areas where ecological / biodiversity enhancement could be made within the site beyond the current proposal. The applicant should take the opportunity to maximise the sites restoration including through

additional locally characteristic planting, trees and habitat. If minded to permit, aftercare should be secured via condition.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Emma Parkes', with a stylized, cursive script.

Emma Parkes
Head of Development and Building Control