

Response to Rock Common Restoration Planning Application

January 2023

This response is from a small group of interested members of the community. We are aware that a great number of objections have been raised by the community about this planning application and that any actions on this site will have far reaching implications for the community for years to come.

Therefore, we wanted to give a balanced and constructive view on the application, in service of 'finding a workable solution' for the Rock Common site, which successfully balances the needs of different stakeholders.

Below is a list of matters which we would support going forward:

1. The **prevention of any leachate** from the Biffa landfill accessing the aquifer beneath the Rock Common site.

We would want:

- a. Reassurance that any reduction in pumping will be subject to regular water testing for contamination at the point at which water exits the site and that pumping will not be reduced if contamination is detected. We are aware that the leachate risk should reduce over time, but that the speed of this reduction is unknown and therefore continued monitoring over a prolonged period of time is necessary.
 - b. Any Perched lakes to have additional water pumped into them during dry periods to ensure they don't become stagnant. We believe that it is in Wiston's best interest to create a viable nature reserve that is attractive to the public/community and thriving lakes will form an important part of this vision.
2. A more comprehensive understanding of the impact and duration of increased **traffic movements on local roads** around the site to manage and minimise the impact on our community.

Specifically:

- a. That the percentage of recycled material leaving the site does not adversely impact the overall time to fill of the site.
- b. That there is greater transparency of the possible variables around 'time to fill' the site and appropriate safeguards are created to contain any community impact in the areas of safety, pollution and time to fill. For example, a maximum number of lorry movements could be set over 4 weekly intervals (rather than yearly) to avoid surges in traffic movements over time, and/or a maximum percentage variance in lorry movements could be set over this period.
- c. That the community receives reassurance that sufficient inert material required to fill the site within a 10-year period is forecast to be available and the activity is unlikely to be extended. This needs formal monitoring by WSCC on a regular basis to oversee the filling trajectory.
- d. That further assessment of traffic movements is made. For example:-

- crash data further away from the site (beyond 750m) as the dangers to other road users will be more extensive than this along the A283
 - to include the lifespan of the fill rather than just the present day along with the additional traffic generated by Rampion 2
 - that there is clarity of the impact of lorries turning on to the A283 in both directions and any increase accident risk from this activity
3. **Clear accountability and independent governance** of the lorry contents being deposited at the site, irrespective of operator. Specifically, a Materials Management Plan is created and deployed to govern the whole process and required standards to include:
 - a. If this is to be an open site, how the contents and movements of all operator's vehicles (not just Dudman's) will be tracked.
 - b. Regular inspections to ensure that there is no direct tipping onto the site south of the Hollow and materials passing through the tunnel north to south under the Hollow are monitored for contamination.
 - c. A process by which vehicles are prevented from depositing material onto local roads and causing a hazard.
 - d. Clarity on who is ultimately responsible for the creation, deployment and oversight of this plan.
 4. An **equivalent feasibility study of the 'rewilding option'** so that a comparison can be made between this and the current proposal. We believe that this will drive a better-quality decision-making process, one which ensures that the needs of Wiston Estate and those of the Community are balanced throughout. Any decision should only be taken with sufficient data about all the options for the site. With this in place we can be assured of the absence of bias in the process 'FOR the Wiston Estate preference' and thereby avoid a judicial review.
 5. **Independent community oversight** and proactive trust-building in the community for the duration of the restoration. It has been apparent throughout the application process that historical grievances have created a lack of trust between different stakeholders. We believe that the process of finding a workable solution, one that balances the needs of different stakeholders, together with the development of partnerships to oversee the deployment of the final agreed option will provide an opportunity to build bridges across the community. Seeing the 'spirit' of this more strongly represented within the planning application would serve to strengthen community trust in the applicants' intent.

To close, a recent Guardian article on the potential impact of historical standards and decisions on landfills, highlights for us that the decisions taken now will have implications for decades in the future:

[Ticking timebomb as ageing landfill dumps threaten English Beaches](#)

We are for learning the lessons of the past and restoring any trust which been eroded due to the impact of these earlier decisions.

Signed,

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