

Comment for planning application WSCC/004/20

Application number

Name

Address

Type of Comment

Comments

I strongly object to the planning application WSCC/004/20 to reopen Standen Tip and I urge the WSCC to reject it: 1. Competence and independence of reports supporting the application The applicant refers to the work of eleven consultants (including Fluid Planning) in the supporting documents to his application. Most of these consultants do not state their qualifications to undertake the work on which they are giving their "expert opinions". Each one of the consultants is undertaking his work on behalf of the applicant who is paying for their services. It is not clear to us that the consultants have a duty to be independent and impartial in collecting data, carrying out analysis and reaching conclusions. They only owe a duty of care to the person paying for their services, not WSCC nor the general public. WSCC should not rely on reports submitted by the applicant supporting his application but commission their own, independent reports by suitably qualified experts and ask the applicant to pay for this work. If they do not get such reports they should object to the application straight away and only consider future applications if there is such independent and credible supporting material 2. Requirement for remediation work The applicant considers that the former landfill site has the potential for high risk to human health from gas and groundwater leachate emissions. I have the following comments on this opinion: 2.1. For the past few years the applicant has let out the site for camping by the general public. Why would he do this if he believed that it truly did pose a risk to human health? 2.2 the applicant's expert, Geo-environmental, made 41 machine excavated trial bits, 12 bore holes and 17 hand pits to provide a coverage over the whole site. This is 70 in total. The expert found "limited leachate" in 5 of the holes, that is under 2% of the total. This suggests that the site is not as polluted as the applicant claims. (See GE17326 GIR1.1 SEPT 18 Report Appendices reduced Part 1.pdf paragraphs 2.6 and 3.2); 2.3 the applicant's expert noted that "substantially lower concentrations [of ground gases] detected at or close to the waste boundaries and reducing further within natural soils suggesting that ground gases are not currently migrating off the site at concentrations which could pose a risk to adjacent land uses which comprise a mix of open space, residential housing, road network". (See GE17326 GIR1.1 SEPT 18 Report Appendices reduced Part 1.pdf paragraph 4.9). If the gas is not moving offsite we question why the remedial work needs to be undertaken at all? 2.4 the report by the Environmental Protection Group stated that "The results indicate that the gas is being generated from degradation of hydrocarbons, oxidation of organic material and possible some slow methanogenic degradation of organic material. This is consistent with the age of the waste. The generation rates will be very low and will be insufficient to cause a large volume of gas emissions". (Geotech Design Report V3.pdf paragraph 2.7). This is further evidence that the remedial work does not need to be done; 2.5 the expert reports do not consider the scale of any pollution, how risky it is to human health and whether it is increasing or diminishing. Could it be that the danger will just pass with time and that no remedial work needs to be undertaken? The applicant has not produced convincing evidence that he remedial work needs to be undertaken. 3. Traffic arrangements These are described in the 0043 Evergreen Farm Planning and Transport Statement (Rev B)(1).pdf paragraphs 2.11 to 2.16. Transport of HGVs to and from the site is a serious topic and affects the livelihood and safety of local residents and the c.140,000 visitors per year to Standen, the National Trust house. The transport section was written by Fluid Planning and it is unclear what particular expertise they may have, if any, in transport. My comments are these: 3.1 It is not clear who collected the traffic flow data referred to in paragraph 2.12, when it was collected or their competence to do so. It is important that any data used is for the times and days when the site is expected to be in use. Can those using the data confirm that this is the case? And the use of average data can be very misleading if there is, for instance, a concentration of local traffic, as is likely, during the rush hour or when Standen is opening and closing. The applicant estimates that there will be around 35 round trip journeys per day through the site, that is one approximately every twenty minutes along West Hoathly Road. Over a week there will be 193 such journeys (assuming a 5 day work week) which compares with the applicant's assertion of 46 journeys per week at the moment from other large vehicles going south along West Hoathly Road. That is an increase of almost 320% south along West Hoathly Road. This is an enormous increase and will cause severe disruption to all those currently using the road and put many lives in danger. West Hoathly Road between Evergreen Farm and Saint Hill Green is narrow, with blind bends and rocks on either side. Two cars struggle to pass each other and usually have to slow to a crawl. When buses travel along the road it is even harder for motorists to make progress and they frequently have to reverse to a point where the road is slightly wider to permit passing. If an HGV was to regularly travel along the road, we anticipate chaos and many accidents; 3.2 the southern access point from the site actually crosses the private road that serves as the drive to Standen. During busy days there are often cars backed up along the West Hoathly Road whilst they wait to go down the drive to

Standen. Having 35 HGVs per day cross their path will only add to the traffic delays and is potentially very dangerous; 3.3 The thought of an HGV vehicle going one way along West Hoathly Road and a bus the other, with steep banks of rocks either side and cars speeding round the approaching bends should be foremost in WSCC's mind when considering this planning application; 3.4 The Road Safety Audit (0043 Road Safety Audit.pdf) considered the entrance and exit to the site, not the effect on the wider road network leading up to and from the tip. These are narrow, busy roads and in places have many parked cars and pedestrians, including many children, walking along these roads. All the extra HGV's will place everyone's lives at risk. The audit did admit that on exit from the site the HGV's will have to cross the road before turning sharp left to continue on West Hoathly Road. This is an obvious danger to all road users, especially those at the bus stop where the lorries will turn sharply. Similar problems exist when the lorries will turn right at St Hill Green. 4. Timing and completion of works I am concerned that lack of availability of capping materials and HGV's may prolong the project beyond the 80 week. The applicant may decide to terminate the works before completion in which case the benefits of capping the site may not be realised even though many local residents and Standen visitors may have suffered from the transport disruption. I ask therefore that WSCC put measures in place that ensure that the work is carried out to a strict timetable and is carried out to completion if they do approve it. Conclusion and recommendation I. I do not consider that a satisfactory case has been made for the need to cap the landfill site. II. I consider that the transport proposals in the application have not considered the restrictions and danger of accessing the site through West Hoathly Road and the devastating effects it will have on local residents and visitors to Standen. The proposal should be rejected on transport grounds. III. If WSCC were to approve the application, it should only do so on the condition that the applicant guarantees that the work is carried out to a strict timetable and to a high standard and is carried out to completion. This will probably require the payment of a significant deposit into an escrow accounts. I recommend WSCC reject this dangerous proposal.

Received

27/02/2020 09:52:55

Attachments