

Planning Application WSCC/004/20

In response to your letter dated 15 April 2021 I have the following comments to make on the documentation supplied by the Applicant.

General

The new documents added to this planning application it is noted that much of the documentation was produced in late 2020 and it begs the question as to why the applicant did not release the documents as requested by the Council by 8th January 2021 and not three months later. It is almost that the applicant is being disrespectful towards the Council.

The question that also needs to be addressed is why does this landfill need recapping? Who was responsible for the original capping and who authorised / approved it? If the capping is now deemed to be inadequate then the organisation(s) who did the original capping and the approval authority have to take some responsibility if it is shown the site needs to be recapped.

Fluid Planning (FP) - The 'Do nothing' option

- 1) The FP does not address the environmental impact of 30+ lorries a day for 80 weeks emitting diesel pollutants into the atmosphere. The FP does not identify where the capping material will be taken from but such an exercise it is probable that the lorries will travel not far short of 1,000,000 miles. In addition at least two diggy dozers will be required to load the trucks and level the material and for the work period specified this equate to almost 10,000 hours of diesel pollutants entering the atmosphere.
- 2) It does not address the human stress of local car drivers being stuck behind these lorries on narrow country lanes and being late for work, late for school, late for an appointment.
- 3) Does not offer the solution of fencing off the land to prevent access to farm animals. Many landfills are fenced off due to a potential contamination and health issues why should Standen be different?
- 4) The emotive words on 'explosions' and 'asphyxiation' due to gases if these are shown to exist on the site in such large quantities then there are modern techniques available to vent and store such gasses which would be a cheaper solution than the capping proposed.
- 5) The *potential* hazards to wildlife, trees and water courses are acknowledged but these *potential* hazards must be balanced against the environmental impact of the lorries and the stresses and strains imposed on the residents of East Grinstead and surrounding area.

Transport Statement (TS)

- 1) The TS suggests that WSSC will widen West Hoathly Road and Saint Hill Green so to accommodate the passing of potentially two trucks in a safe manner. If any road widening is to take place this must be done at the expense of the Applicant and not the Tax payer.
- 2) The TS repeatedly refers to potentially 30+ lorries a day but the lorries come and go hence the TS should refer to daily vehicle movements which it is suggested will be of 60+ each day.

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- 3) Similarly the TS refers to only 6 bus movements a day when in fact it is twice this number, 12 per day. Very misleading.
- 4) The lorry dimensions appear not to include wing mirrors. Typical lorry wing mirrors add an additional 600mm to a lorry width and with two lorries passing on an already constricted country lane requires an additional width of 1.2 metres.
- 5) The TS does not appear to have considered other 'pinch points' on the route to Felbridge, namely the bridge over the Bluebell railway and the bridge over the Worth Way. In addition are these bridges certified to take the weight of two lorries, one loaded the other empty passing each other on the bridges?
- 6) Anybody who has travelled this road approaching Saint Hill Green from the North will know that it is a blind bend. This is not mentioned in the RSA report and certainly not a section of the road where two 32 tonne lorries could pass with ease.
- 7) The RSA suggests that lorries can use the southerly turning at Saint Hill Green. This turning is a 50 degree acute trailing fork turn, a turn you can just make in a medium size family car but unrealistic for a 10.201 metre lorry which has a turning radius of 11.550 metres.
- 8) About 50 metres north of the Standen entrance there is rock both sides of the road and there is perhaps 3 metres between the two near vertical rock faces which are several metres high. This pinch point is clearly sign posted as a narrowing of the road but is not mentioned in the RSA reports. There is barely room to get a single bus through this gap let alone two 3.1 metre lorries passing each other!
- 9) It is very clear from the above three points that the authors of the RSA have made no attempt to drive a 32 tonne, 10.201 metre long, 3.1 metre wide lorry with a turning radius of 11.550 metres over the proposed route and as such the RSA reports have no credibility.

Construction Management Plan (CMP)

- 1) With lorries arriving and leaving the site perhaps every 10 minutes a Banks man should be required to manage these vehicles entering leaving the site and entering West Hoathly road. The CMP does not address this issue and needs to allocate manpower accordingly.
- 2) Such a volume of lorries invariably will get held up in traffic and perhaps arrive at the site two at a time (just like buses coming in three's). The CMP needs to be able to accommodate at least three lorries on the site as they cannot park in the road.
- 3) The CMP includes a wheel scrubber which are not 100% effective and debris is bound to find itself onto the West Hoathly Road. The CMP needs to include procedures for cleaning the public highway on a regular basis to prevent mud, dust and sludge being a safety hazard to other road users.

Conclusion

In considering this application the WSCC Planning committee must carry out an environmental cost benefit analysis between the restoration of a small piece of agricultural land as detailed by the supplied documentation versus the environmental contamination and pollution caused by 60+ lorry trips a day on restricted country

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lanes for 80+ weeks, the effect on Climate Change and the inconvenience to the 30,000 population of East Grinstead.

The application has no merit and should be rejected by the Council.

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