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East Grinstead
RH19 4HH
18 February 2020

West Sussex County Council

Objection to Grant of Planning Consent

Planning Application WSCC/004/20

Evergreen Farm West Hoathly Road East Grinstead RH19 4NE

I am writing to object to planning consent for the proposed development.

1. The proposal is a second application, substantially the same as Application WCCC/01/19 that was withdrawn. This objection is as my previous but modified to take account of revisions to the traffic study in this new application
2. The proposal is intended to provide a dumping ground for waste from other sites and to avoid landfill tax.
The address of the applicant given in the Acoustic Report by Anderson Acoustics is Mr Pearce Stonelands Farm, Copthorne RH10 3RF, the same as the address registered at Companies House for

AMV Haulage Ltd (3537714) a company engaged in earth removal and transportation.
TJS Services Ltd (03537714)
C and A Land Reclamation Limited (07647788)

TJS Services is registered at the same address as Mr Pearce at Stonelands Farm but the names of the directors registered at that address are Anthony and Lorraine Verbeeten.

The Council will be able to check the address of Mr Pearce.

The applicant stands to make substantial profit by allocating excavated soil taken from other sites by his haulage company that would otherwise suffer the burden of landfill tax. This proposal is for dumping 150,000 cubic metres of soil thereby avoiding landfill tax in the order of £10 million at the current rate of £89 per ton.

The cost of the proposed transportation of 150,000 cubic metres of soil could not otherwise be justified by the increase in value of 4.4 Hectares of farming land.

3. The amount of fill amounting to approximately 5 metres over the whole site is excessive and not necessary for reclamation of farming land. The land is currently in use with no detrimental consequence to the owner.
4. Acoustic Report by Anderson Acoustics dated 12th December 2019.

The report is a revision of the original report submitted with Application WCCC/01/19. The report covers noise from site activities to neighbouring properties in accordance with BS 5228 Part 1. It does not however cover noise from lorry movements in the roads approaching the site.

West Sussex Waste Local Plan Policy W19 requires that noise and dust from traffic are controlled to such an extent that there will not be an unacceptable impact on public health and amenity.

BS 5288 Part 1 requires that access traffic should be routed away from noise sensitive premises. The planning and transport statement by Fluid Planning Ltd implies that 70 lorries per day will pass through East Grinstead centre including London Road, Ship Street and Dunnings Road. A noise survey should be conducted at sensitive locations along the routes proposed to show that the increase in noise level will be within accepted guidelines. The methods of Calculation of Road Traffic Noise (CTRN _ISBN 0 11 550847 3) issued by Department of Transport in 1988 should be followed. The Criteria of BS8233, the National Planning Policy Framework and the West Sussex Planning Guidelines should be met.

5. Planning and Transport Statement by Fluid Planning Ltd, not dated or signed but comprising 17 pages Referenced 0043:

The Statement has been revised from the previous application WCCC/01/19 to describe access routes to the site and make reference to WCCS W18 .

The West Sussex Waste Local Plan Policy W18 includes the following requirements

W18 Requirement (paraphrased)	Objection
(b) the development will be permitted provided there is not an unacceptable impact on the environment	The road surfaces leading to the site are already breaking up with many potholes. The proposed 70 heavy lorries per day will further damage roads. Noise and vibration from lorries will be unacceptable in East Grinstead
(c) (i) Lorry Route Network should be used	Nearest is A22 from Felbridge to Forrest Row
c) (ii) vehicle movements should not impact capacity of highway network	Refer to East Grinstead Traffic Management Study for West Sussex County Council by Atkins. An additional 70 lorries per day will result in unacceptable traffic delays on approach roads to East Grinstead.

The revised statement paragraph 2.12 includes a traffic study of traffic flows.

Traffic is given in the table as “the total flow rate over a typical week”. The corresponding daily flows for West Hoathly Road are given in the following table:

Since the study gives two alternative routes, West Hoathly Road and Saint Hill Road it is assumed that half the traffic will pass along each

	Existing HGV and Busses Per Week	Existing HGV and Busses Per Day	Proposed additional HGV, Assuming half	Increase %
Northbound	143	20	17	185%
Southbound	77	2	17	950%

Based on the statement in the paragraph 2.12 it can be seen that there will be a huge increase in the traffic of heavy vehicles for the period of construction which is given in the report as 80 weeks. Southbound traffic of heavy vehicles is increase by more than nine times.

This traffic via West Hoathly Road will flow through the middle of East Grinstead along London Road and High Street both of which are unsuitable for frequent heavy goods vehicles. The mini roundabouts at the top of Ship Street will be a source of traffic congestion and will probably be damaged.

Both London Road and High Street are narrow high streets where cars and busses park.

The existing busses have to stop and wait for cars to allow them to pass as the road is not wide enough for a car to pass a bus or heavy goods vehicle.

A number of the vehicles will pass along The High Street where the 15th Century historic listed buildings will be damaged.

This amount of heavy goods traffic will be seriously detrimental to pedestrians and local traffic.

Ship Street and Dunnings Road have private houses close the road. Northbound lorries will be producing high noise levels when ascending the steep gradient. The increase in noise will far exceed the recommendations of the planning guidance and British Standards

The streets in East Grinstead, West Hoathly Road and Saint Hill Road are both light duty roads constructed of tar macadam on hardcore. They are already cracking up under the present traffic especially near the edges, road gulleys and manholes.

It would probably cost more to repair these roads than Mr Pearce's potential profit of £10 million on landfill tax.

If planning consent is to be granted (which it should not) then the lorries should be required to travel along the Lorry Route Network being the A22 and A264 then along Imberhorne Lane and Saint Hill Road. They should be expressly forbidden from travelling through East Grinstead or along London Road, High Street, Ship Street, Dunnings Road, West Hoathly Road north of the entrance to the site, West Hill, Hurst Farm Road, Brooklands Road, Herentye Drive

Vehicles travelling from the Applicants site at Copthorne should be required to travel along the Strategic Lorry Route A264 and A22 avoiding East Grinstead centre and the roads listed above.