



Chris Cousins
Head of Planning Services
West Sussex County Council
The Grange
Tower Street
Chichester
West Sussex
PO19 1RH

20/10/08

Dear Mr Cousins,

*Planning Application for Landfill at Rock Common Quarry,
Washington – Environmental Statement, Regulation 19 Response
(Additional Information) June 2008 - **OBJECTION***

I am writing on behalf of Chanctonbury Landfill Action Group to object to the Environmental Statement and Regulation 19 Response submitted by Veolia Environmental Services for a waste landfill site at Rock Common Quarry, Washington. Our reasons for objecting are set out in the enclosed report.

Contrary to Veolia's claims in Section 1 of their submission, we do not feel that Veolia has been at all open and communicative regarding its plans. Rather the opposite is true – Veolia has not communicated with CLAG since 2006. We also consider that Veolia delayed submitting the additional information far longer than was necessary.

On the one and only occasion CLAG met with Veolia, the company explained it is aiming to develop an integrated waste management framework covering the entire South East of England. We are aware that in 1995, a 25 year waste management contract was secured by Veolia with Hampshire County Council. In 2003, similar 25 year contracts were awarded to Veolia by East Sussex County Council and Brighton and Hove City Council.

Landfill capacity in Hampshire is scarce. Veolia has only one operational landfill site available there, at Milton Road Pennington, and void space will run out long before the contract expires. The situation is equally difficult for Veolia with the East Sussex and Brighton and Hove City Council contracts. It doesn't take much imagination to see what Veolia's real commercial agenda is for Rock Common Quarry. Even if Rock Common was suitable for landfill, which it isn't, we are sure people in West Sussex would take great exception to the importation of waste from nearby WPAs.

Regarding the Regulation 19 Report, you will see that there are very many inconsistencies and irregularities in the information supplied. More so, it must be said, than I have ever seen in a technical submission in my entire professional career. The Flood Risk Assessment (originally missed out) is so wide of the mark we believe it should be rejected. The same is true of the Hydrogeological and Hydrological Impact Assessment (see Appendix A). This

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largely comprises information which has been copied from other sources and then materially altered to support Veolia's case. The Transport Assessment, a major area of change from the original planning application, is so riddled with basic errors that it is hard to believe it could be considered credible.

Meanwhile, Veolia has avoided answering many of the legitimate concerns that have been raised in letters of objection. Not least of these are the very serious health concerns associated with landfilling. We have shown that these are validated by a growing body of recent medical information which should not be ignored (see Appendix B).

We were originally supplied with an electronic copy of the submission on a computer disk produced by Veolia. We and other stakeholders, and even Horsham District Council found key sections of information were missing. They included for example, the supporting data for the Flood Risk Assessment without which it is not possible to fully understand the assessment. Was this a deliberate error by Veolia or just an unfortunate oversight? Presumably, we shall never know.

Leaving aside the missing information and inadequate responses, we would ask the County Council to draw the attention of officers and elected Councillors to the scores of errors and inconsistencies in Veolia's submission. These are in addition to those we reported previously to you, between Veolia's original Non-Technical Summary, the Planning Application (Volume 1), and the supporting Environmental Statement (Volume 2).

In our view, the 'Environmental Statement and Regulation 19 Response' does not render Veolia's planning application acceptable. Overall, we hope you will find more than enough grounds for concern and, we trust, sufficient grounds for refusal.

Yours sincerely,

John Auckland
Chairman - CLAG