

Amy Bray

From: Development Control (DMW)
Subject: FW: FAO Jeremy Patterson. Planning application LW/799/CM(EIA). Objection. Reference: RRB1

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Sent: 02 April 2018 7:01 PM
To: Development Control (DMW)
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Dear Mr Patterson

Planning application LW/799/CM(EIA)

Objection.

Reference: RRB1

Dear Sir,

I object on the following grounds.

1. The development is not planning led.

There are numerous instances, clearly identified in the objection literature, where this application contravenes the development plan. Including established planning policies at local, regional and strategic regional level. ESCC has given notice of departure from established policy.

No robust case has been made that would justify such a significant departure from the development plan. To the contrary, the evidence of detrimental impact produced by objectors and statutory consultees appears conclusive in supporting the development plan.

2. The ES is not a reliable document on which to base an accurate assessment of environmental impact.

Each aspect of the environmental statement that has been subject to professional analysis either by statutory consultees or professional consultants commissioned by statutory consultees (including Newhaven town council) has been shown to be inaccurate.

Numerous instances of significant under-estimation and under-representation of environmental impact have been established. Each aspect of environmental impact within the statement that has been examined has shown significant inaccuracy, including all areas that are of particular relevance in judging the most likely impacts from this specific proposal. The magnitude of error is certainly enough to alter the judgement and classification of harm. These include :

- The traffic impact assessment (see study commissioned by Newhaven town council)
- The air quality impact assessment (see study commissioned by Newhaven town council)
- The landscape and visual impact assessment (see comment by South downs national part authority)
- Ecology impact assessment (see comment by Sussex wildlife trust)

None have been withdrawn since the applicants last minute amendment.

The published data shows that the noise impact assessment, its methodology, background noise readings and assumed source noise levels remain unverified and not subject to significant review or challenge. Noise is clearly a major potential impact and given the under-estimation and under-representation of environmental impact shown to exist in other aspects of the environmental statement, it would be negligent of the planning authority if the noise report submitted by the developer was not subject to detailed scrutiny and the noise levels quoted in it independently verified. This must be done before any reliable decision on noise impact can be made.

3, The environmental statement ignores any impacts from activities that are classified by the applicant as "permitted development". Although the precise nature and extent of these activities is not clearly defined. Many of these impacts will only arise as a direct consequence of this particular proposed use (i.e. aggregate storage and processing) and are likely to be significant. Therefore the environmental statement does not fairly and completely represent the environmental impact of the proposal as a whole and does not form a reliable basis on which to form an opinion.

The activities arising as a consequence of the use of the East quay for the import of aggregates by ship (and presumably also by road), including the unloading, handling and temporary storage of aggregate from ship and lorry and all associated operational activities are excluded from consideration.

The impacts on the community, although potentially significant (for example on air quality and noise) are not accounted for. What precise operational aspects of unloading, storage, transport etc are excluded from consideration is not clearly defined. This issue appears (from that published by the **LPA**) not to have been subject to detailed scrutiny by the planning authority, although it remains

crucial to obtaining an accurate picture of total impact on the community. There is potential for some significant operational activities to be "hidden" in what is assumed to be permitted development. The local planning authority has a duty to take into account all potential impacts on the community that arise as a result of the proposal.

4. On a more subjective note, It is less than a year since the publication of the "clean, green and marine" strategy for Newhaven (produced at significant cost to the public). This promotes a vision of high value, high quality employment in high tech environmental and marine industries, it has been widely welcomed and was done in consultation with the local community. It would be ironic indeed if, so soon after this strategy was published, a development was allowed (in the face of almost universal opposition from the local community) which, by using up such a large amount of the available quayside space and environmentally blighting the area, would effectively prevent and discourage any future influx of "clean, green, marine" industries. While providing only low numbers of the lowest tech, lowest value jobs together with significant environmental harm.

Given the above it is clear that the **LPA** must refuse the application.

regards

Robert Burns
4 Beach Close
Seaford