

Points of objection raised by SOCS to the proposed land raise sites at Newick and Halland

There are a number of proposed landfill/land raise sites within the catchment area of the River Ouse, notably at Newick (site 16), Halland (sites 1, 23) and Glynde/Ripe (sites 3, 5, 6); all of these are close to watercourses. We are particularly concerned that raised sites may be created at these locations, requiring engineering works and the creation of earth embankments.

The River Ouse, its tributaries and surrounds are important areas for wildlife; the river supports a surprisingly wide range of fish and the surrounds abound in bird life and small mammals.

In addition to the widest range of cyprinid fish the River Ouse has a population of migratory (sea) trout and populations of four species protected by EU Habitats Directive 92/43/EEC, Annex II. Annex II list the habitats and species whose conservation requires the designation of special areas of conservation.

Meadows close to River Ouse abound in bird species including many now considered to be uncommon, such as yellowhammer and skylark.

Although the proposals refer to non-hazardous, non-inert (biodegradable) waste (paragraph 12.4; first paragraph CS6) they also include residues from recycling and reprocessing facilities (paragraph 12.1) – this might include ash from the Newhaven incinerator.

There appear to be no details relating to leachate management, i.e. collection and treatment, or containment. Such leachates may contain heavy metals and organic compounds, including PCBs and dioxins. We are not satisfied that leachate will be prevented from entering watercourses close to sites and we therefore formally object to the commissioning of these sites for landfill. The following notes form the basis of objections to each site:

Objections to site 16 [Newick]

The proposed site is bounded by River Ouse on both western and southern sides. In addition it is bounded to the east by a small stream draining Piltdown pond and lakes at Barkham Manor; the stream joins River Ouse near to the bottom boundary of the site. The proximity of the proposed site to these watercourses might result in pollutions to River Ouse from leachate.

River Ouse contains runs of sea trout *Salmo Trutta* L., which have been observed spawning in the stretch of water bordering the proposed site (from Gold Bridge weir down to Sharp's Bridge and, in 2005, this stretch of water was afforded a *Salmonid Designation* under European Union Freshwater Fish Directive 78/659/EEC.

Additionally the River Ouse has populations of four species protected by EU Habitats Directive 92/43/EEC, Annex II. These are bullhead *Cottus gobio* L., twaite shad *Alosa fallax* L., brook lamprey *Lampetra planeri* (Bloch) and sea lamprey *Petromyzon marinus* (L.). Parts of the site can flood during very-high flow conditions in River Ouse. Denial of this natural flood plain will result in higher water velocities in the waters below the site and an increased incidence of flooding events and bankside erosion. Such conditions may result in destruction of sea trout spawning habitat and river nesting sites of species such as kingfisher and yellow wagtail.

Objections to sites 1 and 23 (Halland)

The proposed site is permeated by waters and springs feeding the upper reaches of Ridgewood Stream and Little Horsted Stream, tributaries of the River Uck - the principal tributary of the River Ouse.

The proximity of the proposed site may result in leachate pollutions to both streams where they are at their most vulnerable – i.e. in their upper reaches.

Objections to sites 3, 5 and 6

The proposed site is permeated by streams draining in to Glynde Reach, a tributary of the tidal River Ouse. The streams are upper chalk brooks of high ecological value.

The proximity of the proposed site may result in leachate pollutions of these watercourses.