

REPRESENTATION

against

DC/26/0955 – WASTE OPERATION AT CALCOT FARM BN44 3AA

submitted by

NORTHOVER MANOR, STEYNING BN44 3AA

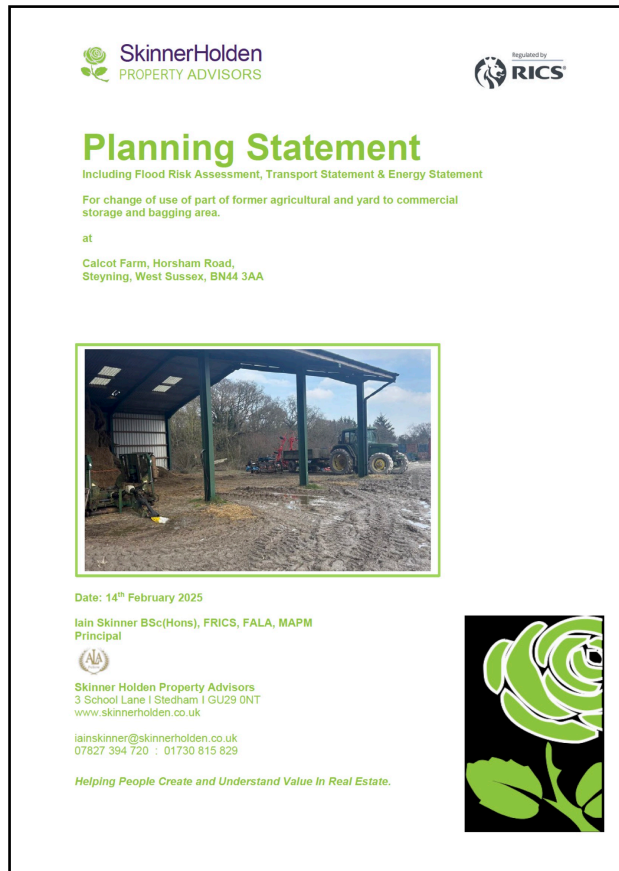
14th August 2026

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1 This is a waste application

This is an **identical** retrospective application to DC/25/0234 that was submitted in 2025. In that application; the **same** agent, on behalf of the **same** applicant, submitted the **same** Planning Statement wording, for the **same** site at Calcot Farm, describing the **same** ongoing animal faeces bagging & storage operation, with the **same** purported B8 usage, featuring the **same** semi-wet animal faeces, and handled by the **same** operator. It is thus obvious that planning applications DC/25/0234 and DC/26/0955 are **identical** in all eight key elements.

DC/25/0234 Planning Statement cover

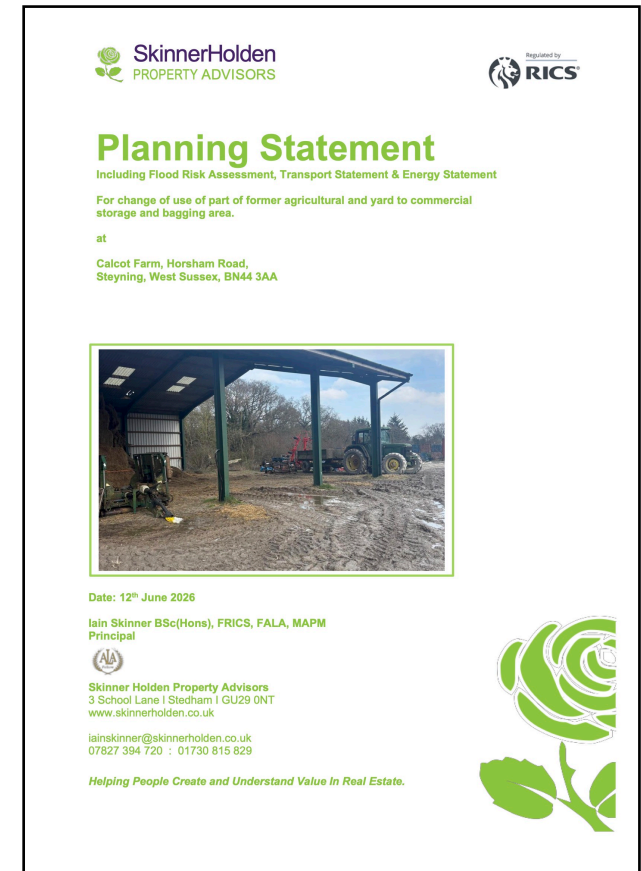


The 2025 DC/25/0234 Planning Statement (see cover at left) is **identical** in substance and in its entire textual content to the 2026 DC/26/0955 Planning Statement (see cover at right), except for having different dates on their covers. The 2025 text was **identical**, copied by the agent into the 2026 Statement.

A waste application under the *Town and Country Planning (Prescription of County Matters) (England) Regulations [2003]* must be transferred to WSCC for determination as a County Matter. In late May 2025, HDC decided that DC/25/0234 was a waste application under the 2003 Regulations and transferred it to WSCC. After learning of this decision, the agent withdrew his application.

Therefore as DC/25/0234 was deemed a waste application, so must the absolutely **identical** DC/26/0955 be a waste application.

DC/26/0955 Planning Statement cover



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2 This is animal excrement, not "soil improver"

The agent's constant use in the Planning Statement of the euphemism "*soil improver*" is a calculated distraction from the actual material his client bags & sells – which is **animal excrement**. The two words "*soil improver*" are merely a marketing term, a means of promoting this expensively-packaged ordure to retail customers. Fortunately, there is a statutory waste classification protocol in the UK that sweeps away these efforts at confusion.



The Environment Agency's WM3 v1.2 GB (see at left) is the UK technical document that operationalises the European List of Waste (LoW) and the hazardous-waste tests under Regulations (EC) No 1357/2014 and (EU) 2017/997. WM3 shows industries how to assign a six-digit **European Waste Catalogue** (EWC) code to all forms of waste. WM3 has become the *de facto* compliance benchmark referenced by DEFRA, waste permits, Duty of Care contracts, landfill acceptance criteria (LAC) and Environment Agency audits.

The EWC is straightforward about animal faeces being classified as waste;

- The EWC code for wet animal faeces is **020106**, so that material is classified as waste.
- The EWC code for semi-wet animal faeces (i.e. compost aerobically created from the above faeces) is **190503**, so that material is classified as waste.

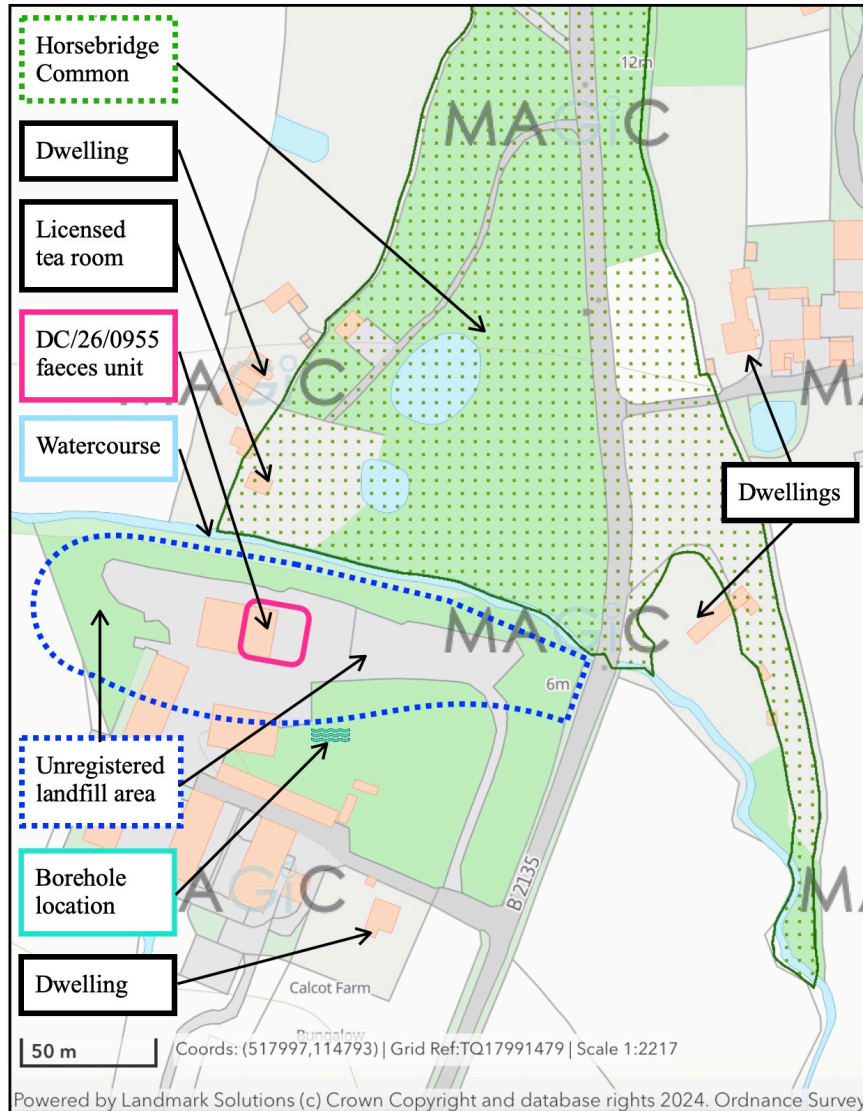
Moreover, none of the loads of semi-wet faeces being imported to the site for bagging are **source-segregated**, thus all the excrement at Calcot Farm has failed the EA's key Compost Resource Framework "*End of Waste Test*". All the material is waste.

Therefore, the applicant's bagging & storage operation of semi-wet faeces, code 190503, is officially classified under WM3 as a waste operation.

Public bodies have a **legal duty** to be consistent in their decision-making, so under the 2003 Regulations, application DC/26/0955 **must not** be determined by HDC. It **must** be transferred to WSCC for determination as a waste application.

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3 This location is highly unsuitable for a waste operation



At left is a plan that shows the DC/26/0955 Calcot Farm faeces unit and critical nearby features. The handling of animal excrement at this site is already causing serious **negative impacts**;

(a) 20m away is Horsebridge Common (CL22), a wildlife haven and registered common land; thus it is **negatively impacted**.

(b) 30m away is a Licensed Tea Room, already drenched in foul odours and bioaerosols from the faeces; thus it is **negatively impacted**.

(c) 50m, 75m, 125m & 175m away are four dwellings, forced to inhale bioaerosols from the faeces; thus they are all **negatively impacted**.

(d) 20m away is a watercourse feeding into the River Adur, probably already contaminated with uncontrolled faecal run-off from the excrement bagging & storage unit, thus it is **negatively impacted**.

(e) 20m away is an artesian borehole, but this fact has been **deliberately withheld** from the application. Water contamination risk is thus **high**.

(f) The ground underneath the faeces bagging & storage unit is part of an unstable landfill area, but this fact has been **deliberately withheld** from the application. Ground movement risk is thus **high**.

This retrospective waste application is in a highly-unsuitable & unstable location and is already **negatively impacting** local residents and the environment.

The application must be transferred to WSCC and **refused**.