

Sue Bennett  
Hollytree Lodge  
Oak Grove  
Loxwood  
RH14 ODN

Date 18<sup>th</sup> August 2021

Dear Sirs

**Re: Application No: WSCC/030/21**

**Letter of OBJECTION**

**Loxwood Clay Pits Limited: "Clay quarry and construction materials recycling facility, Pallinghurst Woods, Loxwood Road, Loxwood, West Sussex RH14 0RW"**

I am submitting this objection letter to strongly oppose the above application by Loxwood Claypits Limited.

I sincerely hope that the planning officers not only read the lengthy application documents but in addition listen to the 3 webinar sessions run by Protreat in 2020. In the application these are detailed as "public consultations." Having attended the webinars these were far from a fair and "consultation" process. They were completely controlled by Protreat in terms of the content with at the end a few very selected questions only briefly answered. In addition to this I am aware of several people who were refused the opportunity to attend the webinars based on their post code. This clearly was not a fair and open "public consultation process" and should not be recorded or considered as such.

I have lived in Loxwood for 21 years. I regularly use the woodland area and I am very familiar with the locality, and the rural roads around Loxwood and the neighbouring villages. For many reasons this proposed development is totally inappropriate for the area and the local community. It will destroy woodland some of which is ancient. There are plants and wildlife in the area which would be destroyed and an eco-system which has built up over 1000's of years. Once removed this is irreplaceable. Should this development be allowed to go ahead it will have a damaging impact on the area as well as serious safety impact for the community.

In a time when the World is facing Global Warming issues, we are all being encouraged to preserve woodlands and to plant more trees. Therefore, it seems totally absurd there is a proposal to destroy an established woodland. Whilst I acknowledge the planners cannot take this into consideration, I would like to raise the fact that the owners of the land also own a significant amount of the woodland. It is clear in making this application, which Protreat in their webinars referred to as "a small development" that longer term their plan would be to increase their development which would mean destroying the whole woodland. If this were not the case, I question why the landowners have invested in the woodland, over a number of years, in the first place. Therefore, by making this statement I would like to bring to the planners' attention if the current application is approved the landowners will then make subsequent applications for the rest of the woodland. The reality of this is longer term the whole woodland is likely to be destroyed and is unlikely to be for the duration of 33

years and will be long term. This will destroy the area and have a significant impact on the local community.

### Location

The location of this proposed development is in breach and contradiction of the National Policy which states waste sites should be sited in built up areas of brownfield sites. This is a rural area on greenfield land.

Within West Sussex there are already established sites with the capacity to manage construction waste. These are in far more suitable locations. I understand that West Sussex has no requirement for additional waste processing capacity.

### Road use and access

Loxwood Claypits propose to run in excess of 42 heavy goods vehicles each day along Loxwood Road, a 3 km stretch of rural road which is narrow in places and for the majority stretch has no pavements or street lighting and is a winding road with hidden bends and has trees and plants overhanging the road.

If the applicant's figures are accurate and correct for the number of vehicles per day, this would equate to an HGV every 10 minutes or so, or 12600 per annum, along rural roads, to reach their development site. There will be peak times for the transport which will increase the intensity of vehicles. As a person familiar with the local roads, I can see that this will not be safe for this type of increased traffic use and will have a significant impact on the safety of the Highway.

The road surface and structure would not support such continued heavy goods vehicle use. There is no mention in the application about the cost of maintaining the road. Currently the road surface is fair which is ok for a rural local road with local use. If the volume of HGV traffic proposed were to use this road, very soon the road would deteriorate resulting in costly repairs and ongoing maintenance. This would cause disruption to the community while these were undertaken. I am mindful this application is for a proposed time frame of 33 years, however as stated previously if further areas of the woodland were subject to a further application the time sale would significantly increase.

Along the Loxwood Road, near to the Mucky Duck Pub the road dips and narrows. During rainfall this stretch of the road floods and vehicles are required to drive in the middle of the road to safely pass through the flood water. I know this, as do local residents. Should there be in excess of 42 trucks using this stretch of the road each day I have no doubt this would have a significant safety impact on other road users, cyclists, horse riders and walkers.

Below is a photograph taken by my passenger whilst driving along the Loxwood Road on 9<sup>th</sup> August 2021.



Due to rainfall a car needed to drive in the middle of the road, as the road was flooded. This is a regular occurrence along this stretch of road. Local drivers are aware of this and give way to traffic coming in the opposite direction. This would not be safe if HGVs were also using this stretch of road. The HGVs are much wider than cars and are likely to take up most of the road and they would cause significant splash.

There is a severe highway safety risk at the junction between the Loxwood Road and the A281 at Rudgwick. As a car driver and a cyclist, I am aware this is a junction which has restricted view when pulling out of Loxwood Road onto the A281. For HGV drivers their view will be restricted further and their movement slower than a car and therefore I have serious concerns about the safety of such vehicles pulling out. The A281 is already a fast road, and I cannot see this type of increased traffic is safe in any way.

Several school buses (both Local Authority and Independent) use this route. Most of the route has no pavement, there are no designated bus stops, and therefore students get on and off buses along the roadside. I have serious concerns for public safety with an excess of 42 HGV'S using the route day in day out. The time-of-day school buses will be running will be the peak times for the HGV's to be running which increases the risks to students. In the Winter months students will be getting on and off buses in the dark along roads with no street lighting. This is a serious safety risk.

The statistics provided by Loxwood Claypits are misleading regarding the increase in volume of traffic. They have stated there will be a 3% increase in traffic. The reality is there will be a 300% increase in Heavy Goods Vehicle traffic which I have no doubt will have an impact on road safety and public safety.

#### Demand For Clay

There is no demand for clay in West Sussex which is detailed in WSCC Minerals Report. WSCC have sufficient resources for 25 years. The applicants state they will export clay to West Hoathly Brickworks. This is a site that is now closed. The impact on the environment in extracting clay and then transporting it, is not environmentally sound. For this reason, clay extraction is usually and typically situated adjacent to brick making factories. Any movement of clay would include use of HGVs in a rural location, along country roads which would impact on road and public safety as well as cause a noise nuisance. I have no doubt that Loxwood Claypits propose to use the site for commercial landfill rather than extraction of clay.

#### Development Plan

The proposed operation does not conform with either the Loxwood Neighbourhood Plan, or the Chichester District Local Plan for development in a rural area. It is not sensitive to its setting in terms of location or size. The plan does not enhance, protect, or compliment the natural environment and it does not bring any benefits to the local community

### Location of site including access

The proposed site is located within 8 hectares of woodland, some of which is ancient. This area is totally unsuitable for any commercial development and one that will be in operation for 33 years ( although as stated previously if further applications are made for areas owned by the landowners this timescale will be significantly increased ) . The distance from the application site to the Lorry Route Network (including the woodland roads) is 4.55km which exceeds the recommended distance. As described above the route to the Lorry Route Network is along rural and narrow roads which would be unsafe for HGVs to use on a daily and regular basis for 33 years plus.

Loxwood claypits propose to access their development site via a 1.3 km woodland track. This track is owned by the developers and therefore perhaps they feel that they do not need to comment on the suitability in their application. However, it is clear to anyone who uses this route, that this is a woodland track that is not suitable for vehicle use, let alone more than 42 HGV vehicles per day. In my opinion this track would need to be built as a road to take the weight of the vehicles and the volume of traffic proposed. The requirement to build a road would seriously impact on the woodland location and would visually have a massive impact on the environment. I would also be concerned about the impact on the woodland in building a road and the use of concrete and perhaps tarmac.

The woodland track is currently part of a Public Right of Way application. There are also several public footpaths along the distance of the track that cross over. I cannot see in the vast number of documents that the developers have submitted, any consideration has been made as to how they propose to manage members of the public using the footpaths whilst 42 HGV's drive up and down. This has serious safety implications to anyone using the area such as walkers, runners, cyclists and horse riders as well as for any animals that live in the woods (bats, birds, deer, badgers, foxes, etc)

The applicants propose to apply to widen the junction on the Loxwood Road to access the woodland area. I have serious concerns about the safety of this even with a wider junction. The Loxwood Road at that point has a 60 miles per hour speed limit and whilst traffic may not travel at that speed at that specific point as the junction is on a bend in the road, any HGV's turning and crossing across traffic from Loxwood would need to slow down. This slow movement of HGVs at this point in the road has serious safety implications for road users.

The proposed access site is currently used as a layby for members of the public to then access the woodland area by foot, cycle, horse riding. If this is developed and the junction is widened this would have an impact on many people. This would no longer be a safe area to park and use the woodland. Additionally, the area is currently a track area alongside a green verge. There would be a visual impact if this verge was removed and the junction re developed.

The actual building the applicants propose to build is an 8.5m metre high, 1,400 square metre building in the middle of pristine woodlands. This would be a commercial building and is totally unsuitable for this location. Any type of building is unsuitable in the middle of this woodland for many reasons. A commercial building would have a significant visual impact on the landscape and for users of the woodland.

A commercial building of this size and in this location would destroy the peace and tranquillity of this area. There is zero background noise currently as this is a vast area of natural woodland. Very occasionally a plane can be heard however there is no other background noise. The applicants

propose to use the site for in excess of 42 HGV'S per day to bring commercial waste to the site to be sorted and recycled and waste then transported away again. These vehicles will be powered by diesel or petrol engines so will create noise pollution and the contents of the truck will make noise also. Even empty trucks will cause noise.

The machines used for the site will cause noise. There is no power on site and although the applicants state that 'at some stage in the future the site will be connected to the power network for the provision of electricity', there is no formal commitment or a time frame from them. Equally there is no evidence to say whether this is possible. In the meantime, the machines will be operated by generators. This will cause significant noise pollution to a peaceful location. This noise pollution will be daily for in excess of 33 years.

It will be necessary for lighting to be on site, and this will cause light pollution to a site that is currently natural and tranquil. Again, the light will need to be powered by generators and the light pollution will be daily for in excess of 33 years.

A recycle of commercial waste as detailed in the application will also create dust pollution. This will impact of public use of the woodland, as well as Rikkyo School which is a residential independent school accommodating around 300 students and staff, within 1km of the proposed site.

#### Application to close a Public Footpath for 33 years.

The applicant proposes to close a public footpath alongside their proposed development site, as a temporary measure for 33 years, stating this is for safety reasons. I completely object to this proposal and I question what right the developers have to close a "public footpath". This is a path that I and many other people regularly use and have used for many years. (There is evidence of this footpath on maps dating back to 1800's). To simply say this will be closed as a temporary measure (of 33 years) is outrageous. The applicants have suggested a detour which would be a significant inconvenience to use. The detour is proportionally not balanced to the actual length of the footpath proposed to be closed. I question why the applicants propose to close this footpath.

#### Environment

This development would devastate a beautiful woodland and the surrounding area, that has been in existence for 100's of years. The applicants in their webinar discussed replacing the woodland at the end of their work. This simply is not possible and is purely 'greenwash'. The eco system has been built up over 1000's of years and cannot simply be replaced. Similarly, trees that have grown over many years cannot be replaced by simple re planting.

There is significant wildlife in the woodland such as deer, bats, foxes, badgers, birds and butterflies. This would all be destroyed and irreplaceable. Whilst the application dispute this, there are badgers in the woodland near to the development site and evidence of bats.

At different times of the year there are many plants and flowers growing. There are bluebells and wild orchids which would all be at risk.

For the reasons stated above I again confirm my strongest possible **OBJECTION to this application**

Sue Bennett