

Richard Maclean
Little Spy Cottage
Spy Lane
Loxwood
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Application (WSCC/030/21) is wholly inappropriate in its location for the proposal on grounds laid out in Local and National planning policy. More specifically, I believe the application should be refused for the points I raise below. The proposal is made without due consideration of the environment, the wildlife, the impact on the immediate tranquil site, surrounding woodlands, local roads and local people, many of whom live in the area purely for the beauty and enjoyment of its location.

Suitability

The site is contrary to both the **Loxwood Neighbourhood Plan** and the **Chichester District Local Plan** for development in a rural area. There are far more suitable sites closer to the major road network that are brownfield which fit much better with a circular economy and local and national carbon reduction targets.

The Need

There is no need for a clay for brickmaking, there is evidence of 25 years supply in West Sussex; note The Monitoring Report for 2019/2021) in accordance with Policy M5 (Clay) of the West Sussex Joint Minerals Local Plan (2018/2021). Equally, clay to be used for flood banks should be used from locally sourced reserves – it would be logical in a county where clay is a predominant mineral to source it directly on the site it was to be used on and most flood banks are built in low-lying areas, where there is most risk, not the heavily contoured northern part of the county.

With no need for clay excavation, there is no void to fill so no need for a C&D material recycling facility. Equally there is well referenced evidence of no significant need for new CD&E recycling sites in the county. Furthermore, and something the applicant seems oblivious to - as we are driven towards a zero-carbon emission 2050, modern materials, plant and technology is developing rapidly to allow sites to recycle materials at point of source which completely avoids the need for the facility as described. It is highly probable that well before its planned completion, this site would become outdated and need to be reused for some other activity. I cannot emphasise how quickly this transition is happening.

I believe the applicant has heavily underestimated the volume that can be recycled when most current sites aim at around 90% of C&D Waste being recovered. If 90% is achievable (and this rate is progressively rising due to new equipment and materials), there would be significantly higher lorry movements than the 42 a day as the application due to the need for more waste to be recycled to fill the void.

Traffic Considerations

As planning policy, the site should not be considered for development when other more suitable sites exist that are much closer to the Local Lorry Network and not in pristine ecological condition in rural areas and on rural roads.

I note that the applicants traffic consultant made no significant reference to the Loxwood Road being a rural road, with no mention of considerations for horses, agricultural activities, cyclists and only briefly mentioning pedestrians but importantly, not referenced to either **safety or risk**. The same report found the impact of the proposal “not to cause any demonstrable harm to highway safety”. I strongly disagree. In my opinion, the site is wholly unacceptable for the risk of traffic on the rural Loxwood road with (as mentioned earlier) regular horses, farm traffic, cyclists, runners and even pedestrians who are forced to use it between connections with footpaths and bridleways. This country road has 14 HGV movements a day. This proposal suggests HGV movements increase by 300% (to 56 movements in total). This simply cannot happen without a **significant increase in both safety and risk**. I have driven a horse lorry along this route a number of times and can speak from experience. Passing HGV's on this road is not easy and there are a number of overhanging trees where HGVs are forced onto the opposite side of the road. Contrary to the applicants report an HGV driver cannot see clearly (West) at the junction with the A281 to turn East. Equally an HGV cannot turn West (Left) from the eastern junction without being positioned on the wrong side of the road, this is tricky even in a large car. At the alternative junction with the A281 (closer to The Fox PH) there is a bus stop. If a bus is on station, it will prevent HGV's passing. Many of these danger points seem to have been either missed by the applicants traffic assessment or referred to as “the visibility is in accordance with Manual for Streets” and the junction geometry “can accommodate the turning requirements of the vehicles likely to be associated with this operation” neither assessment mention if a lorry driver can see through the back wall of his cab at 45 degrees.

I am confident all measures would take place to ensure drivers to the potential site keep to the agreed route and to ensure all behave in a respectable manor but I urge readers of this letter to view how dangerous a badly driven HGV is when driving along the Loxwood Road see link – please remind yourselves, this is a rural road <https://youtu.be/8zXetV0oqgo>

It is not clear if the visibility splays at the access to the site need to be maintained by the landowners and if so, has the applicant has approached them for agreement to this? Stephen Gee WSCC - Highways Authority's report found - should a HGV not utilise the whole site access, visibility splays were not adequate (just 74m instead of required 111m). I note also that the WSCC Public Rights of Way report mentions **Local Prow Network and reliance on Loxwood Road for connectivity** with a diagram showing how 4 footpaths converge near (or on) the Loxwood Road layby site access and with no footway this means pedestrians walk in the road. The report mentions this as an important consideration for both Highways and Safety Audits – I can find no evidence of these in the application.

One thing is certain in all this. If this road or site become more dangerous, less people will use it and as a consequence both the community, and nature will suffer.

Public Access Disruption

The 33 year closure of footpath 792-1 would have a hugely detrimental impact on the local woods as an amenity. The proposed detour is 1.3km longer. The applicant fails to realise the significance of footpath 792-1 which knits the web of woodlands footpaths together, it is the primary footpath in

the woods and closing it will discourage people to walk and enjoy the area. I believe this is contrary to policy for protecting public access in the planning process.

Access to Site Disruption

The disruption of the access track will have a significant impact on the crossing footpaths. The access track will need massive improvements to withstand the expected traffic including drainage ditches, dirty water storage etc. 1.3km of 3m wide track will cause a huge amount of dirty water runoff which does not seem to have been considered. The impact on the PROW application along the access track should also be considered as the applicant may need to allow for safe people / HGV interface.

The applicant has had no meaningful dialogue with the owners of the fields (and 50m of their access track) to discuss how a dairy business (who own the track) would be able to interact a herd of young cattle with 42 lorry movements a day and allow the public access across the same land at the same time. This demonstrates the applicants disregard for the well established local (and rural) businesses who are already under pressure from tough operating conditions. I also note WSCC – Public Rights of Way Objection that highlights the **Public Rights of Way exist across the entirety of the farmers track** across the field and that **“the applicant is advised that a public access right has the precedence over private access rights.”**

In another clear disregard for locals to be impacted by the site, when I read the other letters of objection, I was particularly saddened to read a letter from the closest neighbour of the site who's disabled son will be significantly impacted by the proposed wheel wash, vehicle movements and site access changes and to read of the possible disruption to the course used for the Riding for the Disabled Team. The applicant seems to have made no attempt to directly consult the local community to discuss the proposals – the seminars held were in my opinion nothing short of confrontational and displayed bullying tactics.

I have not seen a safe system proposed to allow the use of the layby for current levels of parking with HGVs crossing the site and interacting with walkers, runners, dogs / cyclists and horse riders.

Environmental Damage

The access tracks proposed bridge over the ditch will have a significant and hitherto underestimated impact on the valley it sits in with a huge disruption to the natural environment which floods and dry's across the seasons to create a rich habitat for flora and fauna.

The proposed method of working includes tracked dumpers which are among the loudest pieces of equipment that can be used for this work. I have only summarised a small part of the equipment (just what digs and hauls the clay and places the fill) but my calculations are that the excavator and tracked dumper will emit around 20 tonnes of CO2 a month between them, add to that the rest of the plant and equipment and 42 lorry movements a day as well as the staff cars and support for the site and Loxwoods Carbon footprint will soar.

I was amused that the applicant thinks the jobs will be taken by local people. With a whole career in a similar industry, I think it unlikely many of the workforce will be local. Hand sorters and plant operatives can come from any corner of the globe especially in the current climate.

The sound and dust emissions will ruin the tranquillity of the area where Nightingale song can be heard over hundreds of meters and will definitely impact people and wild animals closest to the site.

The control of rain water on the site appears to not be properly accounted for. As weather patterns become more extreme, wetter winters will mean a significant amount of water will need to be pumped into the storage lagoon to settle out before being released back into the water courses. If the flow of water is too great, silty water will contaminate the local ditches in direct contravention to the water framework directive and causing ecological damage downstream. This is all enforceable by the Environment Agency but it should in my opinion be planned for (most likely with much larger lagoon capacity and therefor larger working areas than in the current application).

The removal of trees and disruption to the forest floor will cause significant harm to the site which will take many years to recover. The forest floor is a precious commodity which takes decades to develop and digging it up, storing it and relaying it will damage it severely. I could find no specification to capping the fill material in the documents but note recent research that trees planted on landfill often fall over due to poor soil strength or fail from lack of nutrients. I understand as much as 2m of capping may be necessary but the only reference I could find was 0.5m.

The substantial building at 1,400m² footprint and at 8.5m high will be a visible scar on the landscape, along with the dust suppression and noise generated within it. The proposed (and favoured) electric connection for the site will include 900m of overhead 11Kv cables along the current footpaths ruining the tranquillity and rural feel of the paths and this will require tree canopy management throughout the life of the operation.

Summary

The footpaths around this site are a superb public amenity. It is a quiet and tranquil site that literally refreshes hearts and minds. It is a haven for flora and fauna. People come from miles around to enjoy these woods and the locals respect and appreciate the beauty and benefit of the site. This proposal would ruin these woods for at least 30 years and for many, that's a lifetime.

The most visible aspect for many will be the impact on risk and safety for the road users and those who live around the Loxwood road.

There are many more suitable sites and many grounds on which the proposal falls short of both Local and National Policy. I am yet to see a meaningful argument for the site. I strongly urge that this application is refused outright and further appeals dismissed too.

Richard Maclean

Loxwood Resident