

Comment for planning application WSCC/030/21

Application number	WSCC/030/21
Name	Greg Martin
Address	FURZE ROAD, 34, FURZE ROAD, HORSHAM, RH12 3ES
Type of Comment	Objection
Comments	<p>Loxwood Clay Pits Development Proposal - Objections</p> <p>This proposal is totally undesirable & should be rejected on the following grounds:</p> <ol style="list-style-type: none">1. The proposal is contrary to facts published in the latest WSCC clay extraction plan (Joint Minerals Local Plan pages 42/43 refer) - Three active brickworks have in excess of 25 years of clay reserves, & the WSCC Waste Local Plan (para 7.4.5 refers - As a minimum, the {currently} allocated sites would be able to meet the theoretical capacity shortfall of 0.68mtpa, without any reliance on unallocated sites) - the proposal is an unallocated site.2. Its suitability of use within the area is out of context with the general environmental surroundings.3. Sustained operation as proposed over 33 years will inevitably lead to an increase in dust & fumes in an environmentally sensitive area, though increased traffic & continual plant usage. As an example, the life cycle of the proposal indicates over 346000 lorry movements in an era when the effects of climate change are critical. The stated mitigation plans outlined in the proposal are unrealistic & based on theoretical optimism rather than real world situations.4. The proposed placement of a large building in an environmentally sensitive area is unacceptable. <p>The proposed outline scheme in attachment PS12 (CMRF & Amenity Building) is unrealistic for efficient operation with only one vehicle access door for entry & exit of waste & no details of planned operation for mechanised waste sorting & handing. The figure PS12 plan view implies a complete lack of knowledge of safe plant & machinery handling,</p> <ol style="list-style-type: none">5. Traffic generation is understated. No account has been taken of traffic movements for establishment & set-up of the site & these are not included in the provided traffic movement calculations (Figure PS14 of the Proposal refers). These would be significant with heavy plant & machinery being moved into the site in the construction phase & particularly associated with the proposed bridge construction to cross the waterway (PS 11 refers). As noted in 3 above, total traffic movements over the life cycle of the project are highly undesirable relative to climate change controls, these additional movements add to the undesirability of the proposal - see also the penultimate para of point 5 of this objection. <p>Traffic access to/from the site is a hazard. Appendix ES F Road Safety Audit report by WSCC addresses such issues, with some mitigating responses provided. However, as an example, heavy lorry exit from the site onto the Loxwood Road does not take account of practical human behaviour.</p> <p>Para 4.3 of Appendix ES E (Technical Note from Highway Consultant) quotes average traffic speed monitored in a westerly direction as being approx. 48.1 mph & a calculated stopping distance of 140 metres. An oncoming motorist with average reaction times would have approx 3 secs to react on seeing an oncoming exiting heavy lorry with a stated visibility splay of 108 metres (page 36 of same Appendix)! This on a rural road with unmade verges (photos on page 7 of the Appendix F Road Safety audit report refers). A situation that is potentially hazardous & life threatening.</p> <p>The width of the Loxwood Road in many places between the site access point & the A281 is insufficiently wide (5.1 meters to 5.5 metres quoted) to accommodate passing heavy vehicles with safety. Typical heavy lorries are 2.495 metres wide excluding wing mirrors - two passing lorries therefore will exceed the stated road width in many places. The proposal for the access track has been amended to include a 7.5 metre wide passing area - proposal Section 5, para 5.1 refers, why then is a much narrower rural road deemed safe? The verges of this rural road between the access</p>

point to the site & the A281 are mostly not made up, thus continued verge damage over 33 years is

highly probable. This represents a continuing hazard to all road users, including pedestrians, cyclist & equestrian riders, more so in bad weather conditions. The burden of road maintenance over the proposed site operation period will fall upon WSCC & the taxpayer, this is unacceptable. Access to the local lorry network (A281) at Bucks Green will require significant junction improvements to accommodate safe turning of 32 ton rigid wheel base lorries, particularly when going left towards Guildford through a severe angled left turn onto the main A281 at the end of a

1km (approx) straight fast section of the main road.

The statements on pages 24/25 of the proposal regarding highway safety are unrealistic & hypothetical when taking common sense & real life human frailties into account & should be vigorously challenged.

The concept of workers on site (stated number =12) cycling or taking a minibus shuttle to work is

unrealistic. A minibus would be uneconomically practical as it is likely that any local workers would

be distributed around the district also thus making journey times unacceptable. Cycling would be potentially dangerous, particularly in winter months. Thus workers would drive, adding to vehicle movements. For example 6 workers travelling to & from work in separate vehicles add another 12

vehicle movements per day or approx. another 99000 over the project life cycle. The proposal for

minimal site parking near to the access track entrance is unrealistic as it leaves a lengthy walk to

get to the operational site, unacceptable in bad weather conditions for the workers. The proposed

parking facilities for workers at the site entrance are therefore totally understated.

The proposal indicates a goal of recycling only 50% of the waste (12500 tons) brought onto site.

This is inefficient & well below accepted industry standard of 70 percent plus. It is proposed to use

the remainder for backfilling rather than improving the recycling rate thus transporting waste (12500 tons) back out of the site to the further detriment of the rural road system.

6. The proposal does not adequately address noise or environmental disturbance. It is suggested that a generator (diesel powered) would be used for site power until/unless prime power is supplied

from the National Network. A generator would need to be of substantial current capacity to run the

onsite plant & machinery, hence would implicitly generate additional noise pollution & would require frequent replenishment of fuel supplies for continued operation (further understated traffic

movements) plus potential site contamination through fuel spillage.

7. Effect on drainage & water - WSCC has raised points regarding drainage & flood risk consultation, which have not been adequately addressed. WSCC Drainage & Flood Consultation WSCC/030/21 refers.

8. There is no local economic necessity for the proposal. It is stated that no current customers exist

for extracted clay & that if none arise, then consideration would be given to construct a "local" brick works elsewhere in West Sussex (Para 1.6 of the planning proposal refers). Para 1.10 of the

same proposal then infers that "the proposed site in Pallinghurst Woods is suitable for brick making" - quite contrary the statement in Para 1.6. For the volume of clay proposed to be extracted, it is not proven that this additional proposal would be economically viable but if such further construction were given permission, it would lead to yet more undesirable development &

associated detrimental consequences.

There would be insignificant local economic benefit as it is highly unlikely that all 12 jobs created would be awarded to local residents, certain implied skills would be necessary for some job roles leaving only those unskilled jobs for local residents so little economic benefit to the community.

Any likely economic benefit is likely to be taken out as profits by the owners of LCP & possibly by Loxwaste (seemingly an associated Company who in their last filed accounts dated 30th June 2020

were operating a deficit in excess of 200K) & not reinvested in the local area. One of the webinars

claims a reinvestment of circa 1m in land management & maintenance (over the 30 years of ownership?). There is no visible or published evidence to support such a claim. There are no stated

plans to give a reassurance of continued reinvestment in land management & maintenance should

the proposal be granted?

9. Whilst not legally required by the planning proposal, a well-documented & structured supporting business plan could provide the basis of a statement of confidence to WSCC that grant of the proposal would be of significant benefit to the county & local community - not merely a mechanism for the generation of profits that are taken at the cost of the above noted disadvantages & that have zero benefit to local people, amenities and the surrounding environment.

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Attachments