

**From:** [REDACTED]  
**To:** [PL Planning Applications](#)  
**Subject:** LETTER OF OBJECTION - WSCC/030/21 - T J Bennett  
**Date:** 16 August 2021 13:47:06  
**Attachments:** [REDACTED]

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## **LETTER OF OBJECTION**

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

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

[REDACTED]

### **OBJECTION**

I have been a resident of Loxwood since 2000 and I fiercely oppose this application. It will desecrate a beautiful and pristine area of ancient/veteran woodland and blight the local country lanes with c12,600 HGV movements per annum for the next 33 years.

The proposed commercial development is totally inappropriate for the area and will deliver no benefit to the local community. The purpose is purely a pursuit of commercial profit, at the expense of the environment and to the terrible detriment of the local communities of Loxwood, Tismans Common, Bucks Green and Rudgwick.

It is inconceivable that this development is proposed at a time when we are constantly being reminded of the need to protect our planet for future generations.

I therefore register my **objection in the strongest possible manner** and urge rejection of the application on the following grounds:

### **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
- It **does not enhance, protect, or compliment the natural environment**
- It **does not bring any discernible benefits to the local community**

### **Demand for Clay**

- There is **no requirement for additional brickmaking clay** as per the latest WSCC Minerals Monitoring Report. WSCC have more than 25 years of resources
- Clay extraction is typically situated adjacent to brick making factories. It is both uneconomical and environmentally unsound to transport clay over any distance
- In their opening statement, the applicant references West Hoathly brickworks as being a recipient for the excavated clay. However, this brickwork has been closed for some months. Further, Ibstock (the operators) advise *"We have other operating sites in West and East Sussex, plus one in Surrey. None of these sites require further off-site supply of clay and all have reserves adjacent at the current time."*
- Pitsham Brickworks (also quoted by the applicant) not only advise that they **have sufficient reserves**, but also, that they **do not use Weald Clay** in their production and therefore this is an irrelevance to the application
- Warnham Brickworks advise that they **have c200 years of reserves** on site and would not import any clay from elsewhere

### **Waste Site**

- Without a need for clay (as already evidenced above), there is **no justification for building of a waste site** at this location
- There are already established locations, with sufficient capacity for construction waste processing, in far more suitable places in West Sussex.
- WSCC has **no requirement for additional waste processing capacity**
- Planning policy dictates that any such development should be **in built up areas or brownfield sites, NOT in a greenfield site** such as this

## Suitability

- The proposed development is in 8 hectares of **pristine woodland which is wholly unsuitable** for such a commercial operation
- The distance from the application site to the Lorry Route Network (including the woodland roads) is 4.55km which exceeds the recommended distance
- As noted below (see Traffic), the route from the site exit to the LRN is along 3.25km of **narrow country lanes, which are totally unsuitable for HGV's**. Such increase in HGV's will present a **severe danger** to other road users
- The development site is accessed by a 1.3km woodland track. Despite the applicant's assurances, this **track is not suitable for any volume of vehicle movement**, let alone 42 HGVs per day. Inevitably this track will need strengthening and surfacing to the further detriment of the surrounding environment
- The application proposes the construction of an **8.5m metre high, 1,400 square metre building in the middle of pristine woodlands**. This is **completely unsuitable development** for this location and would have a **severe visual impact** on the landscape and users of the many PROW's and footpaths in the area

## Loss of Amenity / Loss of Tranquillity

- Having lived in Loxwood for 21+ years I have had unfettered access to the woodland area where this development is proposed and use the area daily
- HGV's will run alongside and cross existing and established PROW's presenting a **severe safety risk** to those enjoying the beauty of the woodlands
- The applicant proposes the **closure of footpath 792-1 for 33 years**, with a diversion that will treble the distance of the original path. As evidenced by historic maps, this is a **footpath that has been in use since at least the mid-18<sup>th</sup> century**. It is an outrage that the developers think they can just take this away at their convenience!
- There is an application in process for the addition of a PROW (per WSCC; DMMO 2/21) which was supported by **117 PWEF submissions, evidencing constant use for >20 years**.
- A further DMMO application in the area has been submitted and is pending validation. This is supported by c30 PWEF's showing constant use over >20 years
- Woodland paths will be crossed by HGVs in multiple places presenting a **severe safety risk to walkers and PROW users**
- This location is remote and tranquil – there is **low (almost zero) background noise**. This **will be replaced with highly intrusive noise, and dust pollution** from HGV's, tracked vehicles and excavators. It will be horrific
- The applicant states 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 by them to do this, and in the interim, **for an unspecified time the whole operation will be powered by diesel generators** creating yet more noise and pollutants
- Movement of HGV's will result in **disruption and loss of the public parking amenity** in the layby area at the entrance to the site off Loxwood Road
- **Light pollution** will emanate from the excavation site and around the layby causing further and intrusive nuisance

## Environment

- The developers propose to **fell c8 hectares of established woodland, including veteran trees**.
- By estimate of average 1 tree per 5 square metres, this means **they will be destroying c16,000 trees**. This is catastrophic - replanting is not a valid mitigation - individual trees are irreplaceable
- The excavation of clay will **destroy hundreds of years of the subsoil & woodland ecosystem** over a vast area
- There will be a **major impact on wildlife and their habitat**, which will disappear from the area due to the disruption. Bats, deer and all manner of birdlife will be affected. Despite what the applicant stated there are established badger setts in the affected area
- The flora and fauna in the area includes Bluebells, Orchids amongst many other precious and at-risk plant life
- **Rikkyo School is situated in an elevated position less than 1km** from the development site. **Noise, dust and light pollution will have a severe effect** on the wellbeing of the c300 students and staff
- The applicants own environmental impact assessment (per paragraph 22.49 of the Environmental Statement, and evidenced by Appendix ES W) states:
  - **"Bio Diversity Impact Assessment Score": "Overall the proposed development,**

*including proposals for habitat retention, creation and enhancement, is predicted to result in a net loss of -35.77 BUs, equivalent to -36.59%”.*

- o The applicant attempts to ‘greenwash’ their proposal and mitigate this significant biodiversity loss by an assortment of non-committal, vague and unsubstantiated measures, delivered in 33 years’ time. Even if these measures are delivered, by the applicants own admission there will still be a biodiversity net loss

## Traffic

- The proposed development would blight the local roads with **12,600 HGV movements per annum** (415,800 over the lifetime of the project).
- There will be a **severe impact on the rural hamlets/villages of Bucks Green, Tismans Common, Rudgwick and Loxwood**
- There will be a **300% increase in HGV traffic**. Whilst the applicants claim only “a 3% increase in overall traffic is not material” (to suit their agenda) they have not presented the correct comparison.
- There are **listed buildings** along the route which will be affected by the increased HGV traffic
- There is a **severe safety risk** to PROW users in the woodlands as these HGV’s travel the 1.3km along woodland tracks from the site entrance to the development site
- There is a **severe safety risk to PROW users at the site entrance** (layby area) on Loxwood Road where people currently park their cars before walking into the woodland
- There is a **severe Highway Safety risk to users of the Loxwood Road**, which is a rural country lane, only 5m wide in places and which is wholly unsuitable for this volume of commercial HGV traffic
- Loxwood Road is a narrow, winding and undulating road, with numerous restricted sightlines, soft verges, overhanging trees and no pavement for the vast majority of its length. It is frequented by **pedestrians, cyclists & horse riders**. **The proposed increase in HGV movements will create a severe Highway Safety risk to users**
- Loxwood Road **is an established school bus route** serving five local (independent and state) schools. Buses pick up and drop off students at numerous points and across various times of day along the length of the road. There are **no pavements or bus stops and the increase in HGV movements will present a severe Highway Risk to young people**
- There is a **severe Highway Safety risk** at the junction between the Loxwood Road and the A281 at Rudgwick. This is a junction with an acute angle between the two roads, for HGV drivers it is not possible to position in such a way as to enable a safe exit on to the A281 and they will therefore be pulling out ‘blind’. Furthermore, if they are turning left (North-West) on to the A281 they will have to cross on to the opposite carriageway to exit – how can this possibly be considered safe?
- **Life changing or fatal injuries** are a sadly inevitable if this application is approved

## Other

- WSCC Planning should investigate the credibility of Loxwood Claypits Limited, and their capacity to deliver such a project. Per Companies House records, LOXWOOD CLAY PITS LTD (Company number 10729828) is a Dormant Company that has never filed any accounts and has no trading history. It has zero employees and zero assets (other than a notional £100 shareholding on the balance sheet). The company Directors have no apparent experience in minerals excavation, materials re-cycling or delivery of environmental sustainability and have been completely absent from any community consultation or discussions.

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



