

Comment for planning application WSCC/030/21

Application number	WSCC/030/21
Name	Graham rapley
Address	4 MILL COTTAGES, NALDRETTS LANE, NALDRETTS LANE, HORSHAM, RH12 3JQ
Type of Comment	Objection
Comments	<p>Demand for Clay: Withreferencetothe latestWSCCMineralsMonitoringReport,thereisnodemandforadditionalbrickmaking clay. WSCC have more than 25 years of reserves. There are three sites with 25 years supply of clay and one with 24 years, therefore the national and local level clay requirements are met. Theapplicant'sargumentforclaydemandisfurther supersededbytheclosureofWestHoathlybrickworks. WhilstPitshambrickworksmaynothave25years'supplyonsite,itdoesnotuseWealdclay(thekindofclayin the application site). Thereisatrendtowardsconsolidationinlocalbrickmaking,ratherthannewbrickworksopening. Clayextractionistypicallyadjacenttobrickmakingfactories.Itisuneconomicandenvironmentallyunsound to transport clay over any distance.</p> <p>Waste Site: Withoutthemineralsitethereisnojustificationforwastesiteatthisunsuitablelocation. ThereiscurrentlysufficientcapacityforConstructionandDemolitionwasteinWestSussex,inestablished locations which are far more suitable. Theapplicant'splanistorecycleonly50%ofthewastebroughtonsite.This iswellbelowacceptedindustry standard. They propose to use the remainder for backfilling rather than improving the recycling rate, however, an increased recycling rate would result in a further increase in HGV movements.</p> <p>Suitability of Location: Thisisagreenfieldsite;Nationalpolicystatethatwastesitesshouldbesitedinbuilt-upareasorbrownfield sites. TheactualdrivingdistancefromlaybysiteaccesspointtotheLorryRoutenetwork(onA281),is3.25km.This exceeds the recommended distance. There is a further 1.3km to reach the site from the lay-by access on woodland tracks. Thus the total distance from site to the LRN is 4.55km, mostly along an unsuitable, minor road. Theapplicationincludesa15,000sqftbuildingamidpristinewoodlands.Theancillarybuildingandquarry- ing operation would have a significant visual impact in the landscape. There are no other buildings within the woodland. Theproposeddevelopmentwouldresultinunacceptableconflicts/impactswithadjacentandestablished farming activity.</p> <p>Loss of Amenity: SiteaccessforHGV'swillrunon,alongside,andacrossestablishedPublicRightofWayroutesregularlyused by members of the public - giving rise to severe safety and health concerns. Theapplicationproposesclosureoffootpath792-1(NorthernBoundary)withasignificantdiversion,at great inconvenience to users. Whilst cited as "temporary" this closure would be for 33 years - a whole genera- tion. PrevailingSouthWesterlyWindswillcarryanynoise,dust,andpollutantstowardsRikkyoSchool(circa300 students and staff) which is in an elevated position less than 1km from the development site.</p> <p>Development Plan: TheproposedoperationdoesnotconformwitheithertheLoxwoodNeighbourhoodPlan,orthetheChichester District Local Plan for development in a rural area. This application is not sensitive to its setting in terms of size, bulk or location. It does not enhance, protect or compliment the natural environment or rural character of the area. Theproposedoperationdoesnotbringanydemonstrablebenefitstothe localcommunity.</p> <p>Tranquility Thislocationisremoteandtranquil-thereisverylowbackgroundnoise. Lightingwillberequiredintherecyclingandwastemanagementbuildingaswellastheofficebuilding,carpark and wheel wash area. Light pollution will be created in an area where there is currently none. Theproposedoperationwouldhaveasevereimpactupontheenjoymentofthesewalkingroutesforallusers. Dieselgenerators,creatingpollutantsandnoisewillberequiredforonsitepowerforanunspecifiedperiodof time. Birdsongwouldbereplacedbyhighlyintrusivenoisefromtrackedvehiclesandexcavators. HGVmovements,skiplorriesandthewheelwashfacilitywillcreatesignificantnoisedisturbance.</p> <p>Environment: Thisisahighlystressedareaforwater,andthedevelopmentwouldfurtherexacerbate this.</p>

Mature trees on the development site have been identified as having potential roost features for bats, some of these will be amongst the first to be felled.

Amongst the bats identified on the site are four threatened (priority species). For example, the Barbastelle Bat is rare in Sussex and is an International European Protected Species.

The development will result in an increase in net carbon emissions from the burning of fossil fuels; removal of tree canopy by felling and disturbance of the woodland floor.

Greener environments are associated with better mental health and wellbeing outcomes, including reduced levels of depression, anxiety, fatigue, and enhanced quality of life for both children and adults.

The development will have a major impact on local wildlife habitat and species. For example, there is an active badger sett within close proximity of the lay-by, parking and wheel wash area that was not referenced in the application.

The lay-by parking area where the wheel wash is proposed to be sited (Pephurst Wood) is an irreplaceable designated Ancient Woodland.

Traffic:

The increased HGV traffic will have a severe impact on the local villages/hamlets of Bucks Green, Tismans Common and Rudgwick.

This significant increase (c300%) in HGV traffic volumes will present a severe safety risk for existing road users along Loxwood Road. This has not been fully assessed.

The proposed site access arrangements are not 'safe and suitable' as claimed and represent a severe risk to other road users and pedestrians.

There remains a risk of impact on highways safety and residential amenity through Loxwood village unless a routing agreement is secured, adhered to and properly policed.

There will be an acute impact on highways safety along Loxwood Road from high passing speeds on a restricted width carriageway. The road is just 5.1m wide at its narrowest point and 5.5m along most of its length.

There is a severe highways safety issue from HGVs entering and exiting the Loxwood Road/A281 junction at Bucks Green.

There is the potential for damage to Listed Buildings which will be affected by increased HGV traffic along the proposed route.

Impacts at the lay-by:

The movement of HGVs and the proposed redesign of the areas will result in disruption and loss of public parking and amenity at the lay-by.

There will be significant light, noise, and dust pollution from wheel wash and staff car parking.

There will be conflict between the private vehicles and HGVs queuing, entering, and leaving the proposed site which will create a further severe road safety risk.

Despite the proposed wheel washing facilities, there remains a significant potential for mud contamination on the surrounding roads. The applicant has not specified a centrifugal wheel cleaner (as was required at Rudgwick Brickworks) this type of wheel cleaner would generate further significant noise.

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Attachments