

From: [REDACTED]
To: [PL Planning Applications](#)
Subject: OBJECTION - WSCC/030/21
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OBJECTION to Planning Application WSCC/030/21 – An application for planning permission for a clay quarry and construction materials recycling facility in Pallinghurst Woods, Loxwood Road, Loxwood, West Sussex RH14 0RW

From : Fiona Wallace, Motts Cottage, Loxwood Road, Rudgwick, West Sussex RH12 3BS

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As a resident of Tismans Common, Rudgwick for nearly 20 years, I am vehemently opposed to this application. It will devastate, not only a beautiful and pristine area of ancient and veteran woodland, but blight many surrounding communities with noise, industrial pollutants and a massive increase in HGV traffic - for the next 33 years. It is a wholly unsuitable commercial development on a greenfield woodland site which delivers no benefit to the local community. In our current environment of 'climate emergency', we should be protecting such areas for future generations, not destroying them for unnecessary and unsuitable and development.

I therefore object in the strongest possible terms and urge refusal of the application by West Sussex County Council. I do this on the following grounds:

Demand for Clay:

- According to the latest WSCC Minerals Monitoring Report, there is no demand for additional brickmaking clay. WSCC has more than 25 years of reserves
- The applicant's argument for clay demand is further superseded by the closure of West Hoathly brickworks
- Clay extraction is typically adjacent to brick making factories. It is uneconomic and environmentally unsound to transport clay over any distance

Waste Site:

- There is no justification for a waste site in this unsuitable location.
- There is currently sufficient capacity for Construction and Demolition waste in West Sussex, in established locations which are far more suitable
- The applicant's plan is to recycle only 50% of the waste brought onto site. This is well below accepted industry standard. They propose to use the remainder for backfilling their claypit rather than improve the recycling rate. However, an increased recycling rate would simply result in a further increase in HGV movements

Suitability of Location:

- National policy states that waste sites should be located in built-up areas or brownfield sites. The proposed site is a greenfield site, hence making it totally unsuitable
- Whilst the site is within the permissible 3km (as the crow flies) distance from the Lorry Route Network (A281), access is only possible via a further 1.3km of woodland tracks. The site exits on to Loxwood Road, which is an unsuitable, minor rural country road
- The application includes a 15,000 sq ft building amid pristine woodlands. The ancillary building and quarrying operation would have a significant visual impact in the landscape, contradicting the developer's description of the project as "artisanal in size". There are no other buildings within the woodland
- The proposed development would result in unacceptable conflicts/impacts with adjacent and established farming activity
- Prevailing south westerly winds will carry any noise, dust, and pollutants towards Rikkyo School, a Japanese boarding school with circa 300 students and staff. It stands in an elevated position less than 1km from the development site

Traffic:

- The increased HGV traffic will have a severe impact on the all local villages/hamlets but specifically on Bucks Green, Tismans Common and Rudgwick
- The 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
- Loxwood Road is a narrow rural minor road. It is not wide enough to allow HGV traffic to pass other vehicles safely without significant encroachment on verges, hedgerows or pavements (where they exist)
- There will be an acute impact on highway 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 highway safety issue from HGVs entering and exiting the Loxwood Road/A281 junction at Bucks Green
- There are a number of listed buildings sited along Loxwood Road. There is the potential for damage to these buildings from the significant increase in HGV movements 5-6 days a week – for 33 years. This has not been properly assessed

Impacts at the lay-by:

- The movement of HGV's 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 HGV's 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.

Loss of Amenity:

- Site access for HGV's will run on, alongside, and across established Public Right of Way routes regularly used by members of the public – giving rise to severe safety and health concerns
- The application proposes the closure of footpath 792-1 (Northern Boundary) with a significant diversion, at great inconvenience to users. Whilst cited as "temporary" this closure would be for 33 years - a whole generation

Tranquility:

- This location is remote and tranquil - there is very low background noise
- There are extensive walking routes in the surrounding area and the applicant's operations would have a severe impact upon the amenity and enjoyment of these routes for all users
- Diesel generators, creating pollutants and noise will be required for onsite power for an unspecified period of time
- Bird song would be replaced by considerable and highly intrusive noise from tracked vehicles and heavy machinery
- HGV movements, skip lorries and the wheel wash facility will create significant noise disturbance
- Lighting will be required in the recycling and waste management building as well as the office building, car park and wheel wash area. Light pollution will be created in an area where there is currently none

Environment:

- This is a highly stressed area for water, and the development would further exacerbate this
- 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 in irreplaceable designated Ancient Woodland
- The entire operation runs counter to the strategic aims of WSCC's Tree Plan

Local Plan:

- The development does not conform to either the Loxwood Neighbourhood Plan, or the Chichester 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
- The development does not bring any demonstrable benefits to the local community

Credentials:

- The applicant, Loxwood Clay Pits Ltd, have no apparent experience in minerals excavation, materials re-cycling or delivery of environmental sustainability.
- They have been completely absent from any community consultation or discussions
- Companies House records LOXWOOD CLAY PITS LTD (Company number 10729828) as a dormant company that has never filed accounts and has no trading history.

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

Fiona Wallace

Fiona M Wallace

