

From: [REDACTED]
To: [PL Planning Applications](#)
Subject: Fwd: Planning Application WSCC/030/21
Date: 30 August 2021 19:30:58
Attachments: [REDACTED]

Objection to the above proposed application by:

Mr C P Cordwell
Whitegables Farm
Loxwood Road
Tismans Common
Rudgwick. RH12 3BP

29/08/2021

Dear sirs,

Below are my objections on the following grounds.

1

Suitability of Location: • This is a greenfield site; National policy states that waste sites should be sited in built-up areas or brownfield sites. • The actual driving distance from layby site access point to the Lorry Route network (on A281), is 3.25 km. 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. • 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. There are no other buildings within the woodland. • The proposed development would result in unacceptable conflicts/impacts with adjacent and established farmland.

2

Demand for Clay: • With reference to the latest WSCC Minerals Monitoring Report, there is no demand for additional brickmaking 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. • The applicant's argument for clay demand is further superseded by the closure of West Hoathly brickworks. • Whilst Pitsham brickworks may not have 25 years' supply on site, it does not use Weald clay (the kind of clay in the application site). • There is a trend towards consolidation in local brick making, rather than new brickworks opening. • Clay extraction is typically adjacent to brick making factories. It is uneconomic and environmentally unsound to transport the clay away from its extraction on already congested roads.

3

Waste Site: • Without the mineral site there is no justification for a waste site

at 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 rather than improving the recycling rate, however, an increased recycling rate would result in a further increase in HGV movements.

4

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. • Prevailing South Westerly Winds will carry any noise, dust, and pollutants towards Rikkyo School (circa 300 students and staff) which is in an elevated position less than 1km from the development site.

5

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. 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 proposed operation does not bring any demonstrable benefits to the local community.

6

Tranquility • This location is remote and tranquil - there is very low background noise. • 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. • The proposed operation would have a severe impact upon the enjoyment of these walking 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 highly intrusive noise from tracked vehicles and excavators. • HGV movements, skip lorries and the wheel wash facility will create significant noise disturbance.

7

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.

8

Traffic: • The increased HGV traffic will have a severe impact on the local villages/hamlets of 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. • There remains a risk of impact on highway 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 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 (SEE PHOTOGRAPHS BELOW.) 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 is the potential for damage to Listed Buildings which will be affected by increased HGV traffic along the proposed route.

9

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.

Yours faithfully

Mr C P Cordwell



