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27th August 2021

The Planning Department
West Sussex County Council
County Hall
West Street
Chichester
West Sussex PO19 1RG

Dear Chris Bartlett,

Re: WSCC/030/21 *An application for planning permission for a clay quarry and construction materials recycling facility (CMRF) for CD&E wastes including the use of an existing access from Loxwood Road, the extraction and exploration of clay and restoration using suitable recovered materials from the CMRF to nature conservation interest including woodland, waterbodies and wetland habitats at Pallinghurst Woods, Loxwood Road, Loxwood, West Sussex, RH14 0RW.*

Rudgwick Parish Council has considered the above application and wishes to submit the following comments in response:

Although the site in this proposal is outside of Rudgwick parish, if approved the proposed development would have a significant negative impact on our residents. The eastbound route identified for HGVs, runs from Pephurst layby and along the Loxwood Road into our parish. It is totally unsuitable for the projected movements and would become potentially unsafe in parts. The Loxwood Road is rural and quite narrow (part only 5.1m wide), and has a badly designed junction with the A281 at Bucks Green with poor visibility. The presence of a Car Sales Showroom & bus stop/turning point there adds to the hazards at this interface. The access onto the Loxwood Road from the Pephurst layby does not meet 'Design Manual Roads and Bridges' standards, whilst the 'Manual for Streets' standards are clearly inappropriate for this situation.

Walkers, cyclists and horse riders from the surrounding communities (including Rudgwick) currently enjoy the benefits of this peaceful woodland area using the many PROWs located therein. Envisage the change to their currently tranquil, health-giving, enjoyable leisure excursions if this proposal were to be permitted. The area would be subject to persistent noise and environmental pollution from the plant, vehicles and equipment needed to run the proposed operations, and people and wildlife would need to constantly keep a wary eye out for the potential hazards caused by frequent HGV movements.

The denigration imposed on this site by such a proposal as this would have a critically detrimental impact upon the inherent flora and fauna, including some protected species. This is unnecessary disturbance for no identified or justifiable need, in our view.

The evidence is unclear regarding the impact the proposal may have upon the staff and pupils of the Rikkyo School in England, which is situated close to the proposed site. The potential for noise and dust pollution is concerning.

A National Climate Emergency has been declared by the UK Parliament. To sanction the activities proposed, in the location proposed, would appear to be diametrically opposed to helping resolve this emergency. There are surely much better locations to minimise the carbon footprint of such activities, and (according to the Monitoring Reports) there are already sufficient existing sites anyway. This proposal would mean the transporting of clay and waste over many miles in diesel fuelled HGVs, use diesel generators for on-site electricity (at least for some years), destroy deciduous trees (part Ancient Woodland), clear & dig 6 hectares of woodland with diesel powered JCBs, concrete over 15,000 sq ft of precious countryside etc. Rudgwick Parish Council considers that this would be an example of unacceptable environmental vandalism which cannot be permitted if we are to seriously address the climate change issues now before us.

There is no need for this development. No compelling evidence has been submitted to establish a need for additional clay supplies, especially excavated in this rural location, poorly located to the Lorry Route Network, and some distance from any brickworks. The latest WSCC Minerals Monitoring Report confirms a 25 year supply with existing pits and located much closer to brickworks. Development of this site would conflict with policies in the Joint Minerals Local Plan. Similarly the Waste Local Plan confirms no need for an additional recycling facility (CMRF) especially in a countryside and greenfield setting such as this. If Local Plans were to subsequently identify a need for either of the two facilities proposed, it would be difficult to imagine a location more unsuitable than that of the proposed site.

In conclusion, Rudgwick Parish Council strongly objects to this application and urges WSCC to refuse it.

Yours sincerely

Sarah Hall

Sarah Hall
Assistant Clerk to Rudgwick Parish Council