

I have previously detailed my reasons for objecting to this application.

I have reviewed the latest information submitted by the applicant and continue to **strongly object** for the following reasons:

The primary purpose of this application is to create a demolition waste processing site in the middle of a woodland using clay extraction as the pretext for its acceptability.

Demand for clay

The applicant has still failed to demonstrate that there is demand for the commercially insignificant quantity of clay to be extracted either within West Sussex, Surrey or beyond.

If the applicant had received even the vaguest expression of commercial interest from a potential brick maker or other customer, I feel certain that they would have highlighted this volubly in their application.

The inclusion of a 32 page marketing brochure from a brick maker does not, in my view, provide evidence of demand and I do not understand its' relevance to the application.

Transport/Highways safety issues

The applicant has failed to respond adequately to or address the safety concerns raised by the traffic consultants engaged by the local community, RSK. The report from RSK dated 19/1/22 states:

“The applicant significantly under-estimated the number of heavy goods vehicles (HGVs) travelling to and from the site....”

The report from RSK concludes:

“There are a number of aspects of the proposals, many of which are worsened by the predicted higher traffic volumes, that would lead to a severe impact in reference to the National Planning Policy Framework (NPPF)..... ..none of which have been addressed in the applicant’s additional submission”.

Conflicts with Public Rights of Way

PROW 792-1

The applicant appears to be dropping their proposal to close/re-route PROW 792-1. However they fail to address how the inevitable impact on the users of the PROW would be mitigated nor provide details of any safeguarding measures other to install gates which would be operated using an unidentified power source.

PROW 795

HGV's and the public would still be sharing PROW 795 (which according to WSCC extends to the full width of the track) with significant risks to public safety.

Bridleway 3240

Vehicle access from the layby will need to cross this bridleway directly. It is not clear how the applicant will minimise the risk to public users of the path.

Ecology and Biodiversity

The applicant's agents states that *"The owners of Loxwood Clay Pits Limited are not the same as the owners of Pallinghurst Woods"*.

However, they go on to say that that they will mitigate biodiversity loss through gains on the woodland which is in common control by the Danhash family and LCP.

It's not clear how both of these conflicting statements can be correct.

Furthermore, if correct, the applicant's agent seems to rely on the assumption that the land referred to will remain under the ownership or control of the Danhash family?

For the reasons stated above I urge WSCC to reject the application.