From: [redacted]
To: PL Planning Applications
Subject: Objection re WSCC/030/21
Date: 27 January 2022 15:09:48

Dear sirs

I am writing to object to planning application WSCC/030/21 regarding the Loxwood Clay Pit & Waste Recycling Plant proposal.

The applicant is attempting to suggest that an objection should not count if you reside outside of their chosen consultation area. The home address of any objector is not relevant to the merits of the objection. As a person with family connections and as a regular visitor to the area, my objection is valid and must be take into consideration.

I object to the proposal for the following reasons:
Waste and Minerals Policies: The applicant is critical of the minerals and waste policies that WSCC has put in place, which help protect the community and the environment from inappropriate development. This is concerning as we would expect any applicant to be supportive of the policies and show its willingness and ability to comply with them
Demand for Additional Construction Recycling Capacity: The applicant has presented no further justification of the need for additional construction materials recycling in West Sussex. Demand for Clay: The application continues to contravene WSCC Minerals Policy M5. The applicant has argued the clay on site is suitable for brick making so WSCC can only consider extraction for that purpose. No other uses for the clay can be considered. Claims by the applicant about the demand for clay and potential uses for it are questionable and unsubstantiated:
(A) Shortfall of clay in Surrey – no evidence submitted
(B) Creation of a new small brickworks (which would be subject to a separate planning process). The trend is for consolidation of brickmaking companies. (C) Comparison with Ibstock Swanage is irrelevant (they are owned by the largest UK brickmaker and they have their own onsite claypit (D) Potential customers for the clay – no specific customers named. Clay is a low value mineral and is uneconomic to transport.
LCP continually refer to the West Hoathly brickworks. This is now closed and is of no relevance to the application. The applicant suggests the closure is an example of failing WSCC policy whereas it is a straightforward commercial decision by Ibstock Brick.
LCP also suggest Pitsham Brickworks is relevant but it is not as they use a different type of clay, i.e. not Weald Clay.
PROWs and Safety: We understand the applicant no longer proposes to request the closure of the footpath along the northern boundary of the site (PROW 792-1), but is silent on the related consequences: (A) How will the impact for PROW users be mitigated (noise, dust, loss of amenity and tranquillity) (B) Safety concerns. No details about boundary security fencing around a site which will have deep pits. PROW users and HGV will still share PROW 795.
An automatic barrier being placed where the HGV access crosses bridleway 3240 and footpath does not fully address the following points: (A) A single barrier can only be placed on one side of the bridleway. However, HGV traffic will travel in

both directions (B) No mention of how this will be powered (C) It is not clear how the risk to public users of the path will be mitigated
Ownership and Biodiversity: The applicants contradict themselves within their own documents. They state that “The owners of Loxwood Clay Pits Limited are not the same as the owners of Pallinghurst Woods.” In contradiction, they then state that they will mitigate biodiversity loss through gains on the woodland which is in common control by the Danhash family and LCP. Which is it? It can’t be both ways. Regardless, this assumption cannot be relied upon as ownership of LCP and/or the woodland could change at any time.

Transport: Our transport consultants advise that the applicant is underestimating the number of vehicle movements, and they consider that there would or could be 200% more than LCP say. This dramatically increases the impact on Loxwood Road and the A281 junction but also access through the woodland.
Our consultants also advise that visibility at the site entrance is even less than the absolute minimum figure the applicant is relying on. There is a particular concern about the increased risk of a car travelling west, towards Loxwood colliding into the rear of an HGV waiting to enter the LCP site at the lay-by entrance.
Ecology and Water Neutrality: We note that the applicant has now submitted a Habitats Regulations Assessment (HRA). However, the woodland supports many interesting species of wildlife which have not been fully taken into account.
This area is well recognised by numerous authorities as being water stressed. The applicant has made no attempt to provide details of how they will overcome the water-stress issues which exist.
The new Bat Survey is insufficient. It only covers very few specific trees in the direct development site and does not cover the wider woodland area which will be affected and disrupted by the development. The survey examined the trees, some of which it is planned to fell, for roosting bats. It has ignored the use of the woods by bats commuting or travelling to their foraging areas.
The Bat Survey errs in referring to Horsham District wildlife and biodiversity policies. The site is in Chichester district.
The applicant does not mention the Duty conferred on the District (NERC 2006) to have regard to biodiversity, and, do not mention the status/legal position of the European Protected Species as updated since leaving the European Union, eg. Barbastelle Bat.
In the UK, around 41% of species have declined in abundance since 1970 due to environmental pressures like habitat loss. A Biodiversity Emergency was declared in 2019 by the IPBES. That underscores the importance of this area.

Kind regards
Katie Pritchard