

Comment for planning application WSCC/030/21

Application number	WSCC/030/21
Name	Chris Blizzard
Address	COXFOLD, COX GREEN, COX GREEN, HORSHAM, RH12 3DD
Type of Comment	Objection
Comments	I OBJECT in the strongest possible terms to the proposed application.

The new information provided by the applicant seems to focus predominantly on criticizing the West Sussex waste and minerals policies and the officials who manage the implementation of those policies. This is an unusual approach and one that should be counter-productive. A far better approach would be to counter all the previous objections with factual analysis and information - but, in the present instance, this is not possible due to the implicit weaknesses of the applicant's case.

In summary, the application seems to be seeking an excuse to dig a series of holes in an unspoiled woodland location, in order to use the holes so created to justify a landfill operation that benefits from a tax advantage of avoiding landfill tax. It should fail and be rejected for many reasons, including:

- To the extent that the economics of the proposal are relevant to its approval, or not, by the county council, the applicant suggests that the project will bring great economic benefits to the local area. This sort of comment should be ignored unless it is backed by a robust and detailed business plan setting out how those benefits will be realized. Having some experience in business matters, I am very doubtful that the business plan behind this proposal is robust. Small-scale clay extraction for brick-making at an unspecified remote location is not the foundation of a good business.
- The applicant states that its clay is suitable for brickmaking - so Policy prevents it suggesting it could also be used for flood defenses. West Sussex has sufficient supply of brick clay and does not need a tiny quantity of additional clay. There is good reason why brick works are generally located at the clay source - it is uneconomic to transport low-value clay. The applicant makes a vague suggestion that it will set up an artisan brickworks at an unspecified location - this should be ignored unless backed up by detailed information. In short, no case is made for a market for the clay from the applicant's proposed pit and the application breaches a number of Policies, as set out in the specialist objections reports.
- Construction and demolition waste recycling should take place on brown field sites - not in the middle of unspoiled woodland.
- The applicant has revised its figures for expected % of waste that is recovered. These revised figures imply a significantly greater than stated amount of HGV traffic to and from the site. It is stated that waste will arrive in skip lorries. It is unlikely that recycled material (and truly waste material that cannot be landfilled) will be removed from the site in skip lorries - the applicant makes no mention of this fact nor to the probability that the contractors bringing waste to the site will be different from those removing material from the site. The strong likelihood is that HGV traffic movements will be considerably larger than stated.
- Access track safety where the track is shared with a footpath. The applicant fails to overcome the issues relating to footpath 795 sharing, for some distance, the access track proposed to be used by HGV. Re-routing the footpath, across a third party's land, is unacceptable unless that third party agrees - which he has not.
- Footpaths and bridleways crossing the access track. The applicant suggests that these crossing points will have barriers, automatically lifted by an approaching HGV. There is no mention of the power supply required for these barriers. If they rise automatically no attempt will be made to take account of non-vehicular users either on or close to the crossing. The resulting danger and risk of accidents is considerable.
- Footpath closure. The applicant seems no longer to request the "temporary" closure of footpath 792_1 where it runs adjacent to the operational site. The applicant makes no attempt to state how safety and amenity will be achieved for users of this path. Safety fencing should be a minimum requirement but that, in itself, would create further negative visual impacts from the project.
- Highway safety. Whilst the applicant seems to be proposing to re-shape the site entrance from the Loxwood Road safety around the consequence of stationary HGV waiting to turn into the site has been ignored. For a vehicle travelling west along the Loxwood Road, towards the site, there will be less than the minimum amount of visibility required to the rear of the HGV - meaning that accidents are more likely to happen. Safety should not be compromised in this way.
- New Highway Code. The applicant seems to have glossed over the impact of the new Highway Code, which came into force on 29 January 2022, providing more protection to non-vehicular users of roads and footpaths.
- Water neutrality. The applicant does not address satisfactorily any of the West Sussex water

shortage concerns raised by Natural England.

- Ecology. By the applicant's own admission, set out in the initial documents, the project is expected to have a negative impact on biodiversity. This is unacceptable and, on its own, should be sufficient to result in reject of the application. The applicant appears to be confused by the different owners of parts of the woodland, implying that an assessment of the impact on biodiversity should take into account benefits achieved by other adjacent owners because there is some link with the owner of the operational site. Elsewhere in the application, the applicant uses the lack of a common owner of the entire wood to justify the approach proposed. The applicant should not be allowed to be inconsistent in this way.

- HRA. This document prepared by the applicant seems to be poor in quality, with many species of wildlife not being taken into account.

For all the reasons previously set out in the original 1500 or so objections (which are still valid) plus the additional reasons arising out of the poor quality of additional information provided by the applicant, the application should be rejected. I very much hope that WSCC will agree and will REJECT the application in the strongest possible terms.

Received

01/02/2022 10:50:30

Attachments