

Comment for planning application WSCC/030/21

Application number	<input type="text" value="WSCC/030/21"/>
Name	<input type="text" value="Peter Hyem"/>
Address	<input type="text" value="BARS CORNER, ALFOLD BARS, LOXWOOD, BILLINGSHURST, RH14 0QS"/>
Type of Comment	<input type="text" value="Objection"/>
Comments	<p>I object to the above application WSCC/030/21 on the following grounds.</p>

WASTE & MINERALS POLICIES: The applicant is critical of the minerals and waste policies that WSCC has put in place, which help protect our community and the environment from inappropriate development. I consider that the applicant should comply with the policy rather than complain about it.

DEMAND FOR ADDITIONAL CONSTRUCTION RECYCLING CAPACITY: The applicant has presented no further justification of the need for additional construction materials for recycling in West Sussex.

DEMAND FOR CLAY: The application continues to contravene WSCC Minerals Policy M5. The applicant has argued that 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.

PROWs and SAFETY. Apparently 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:

1. How will the impact for POW users be mitigated (noise, dust, loss of amenity and tranquility).
2. Safety concerns. No details about the boundary security fencing around a site which will have deep pits.

PROW users and HGV will still have to share PROW 795.

An automatic barrier being placed where the HGV access bridleway 3240 and footpath does not fully address the following points:

1. A single barrier can only be placed on one side of the bridleway. However, HGV traffic will travel in both directions.
2. No mention of how this will be powered.
3. It is not clear how the risk to public users of the path will be mitigated.

OWNERSHIP & BIODIVERSITY.

The applicants contradict themselves within their own documents. They state that "The owners of Loxwood Claypits Limited are not the same as the owners of Pallingshurst 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 the assumption cannot be relied upon as ownership of LCP and/or the woodland could change at any time.

TRANSPORT: I understand from Transport Consultants that the applicant is underestimating the number of vehicle movements that would occur and the true number could well be 200% higher than LCP state. An increase of this size would clearly increase traffic on Loxwood Road and the A281 and also with the access through the woodland with the resultant damage to nature. The extra traffic would also endanger pedestrians and dogs at Pephurst Wood Car Park. Although LCP claim they will tarmac the surface of this at present minor rural road side Car Park, this would encourage greater use of this small area and make the entry and exit of HGVs more dangerous. Even at present there is no real room to pass another car easily. There is particular concern about the increased risk of a car travelling west, towards Loxwood and colliding into the rear of an HGV waiting to enter the LCP site at the lay-by entrance. I also understand that the visibility at the entrance to the site is even less than the absolute minimum figure that the applicant is allowing on.

ECOLOGY & NEUTRALITY. I am most concerned that the applicant has 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 recognized 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 now.

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 planned 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, however the site is in Chichester District. The applicant also does not mention the Duty conferred on the District (NERC2006) to have regard to biodiversity, and does 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.

I trust you will consider all the points I have raised here.

Received

05/02/2022 13:20:53

Attachments