

**From: Louise Martin, 34Furze Road, Rudgwick, RH12 3ES**

**Planning Application Reference: WSCC/030/21**

**Comments regarding Applicant Response dated Dec 2021**

The response submitted by the Applicant is a combination of unbridled arrogance, harassment & the provision of unnecessary & confusing information, whilst ignoring important criteria raised by the original proposal.

The first 37 pages constitute nothing more than an attitude of “I know more than the planning officers & therefore I am right” coupled to bullying & harassment of public officials tasked with doing their job under extreme pressure. This correspondence is irrelevant to the application other than highlighting the difficulties that public officials have in encountering such extreme views by an Applicant backed by substantial amounts of money.

The next 30 plus pages are a copy & paste brochure of a commercial enterprise that has nothing to do with the application. The original planning application makes no definitive guarantees that the Applicant will invest in a new project within West Sussex, namely a brick works. It merely makes suggestions of possibilities – zero commitment. These pages are totally irrelevant to the original proposal.

Then follows another 30 plus pages of the original proposal highlighted with points considered by the Applicant to be important. Again another example of “I know better than you” arrogance.

The remainder of the document is concerned with attempts to rebut perfectly reasonable arguments as to why planning permission should be denied & an attempt to justify environmental concerns, but what is significant is what is not addressed regarding environmental concerns, road traffic safety concerns & financial considerations.

**1. Environmental concerns**

1.1 Sustained operation as proposed over 33 years will inevitably lead to an increase in dust & fumes in an environmentally sensitive area, though increased traffic & continual plant usage. The life cycle of the proposal indicates over 346000 lorry movements in an era when the effects of climate change are critical. This will result in CO<sub>2</sub> & Nox emissions in excess of 20 tons being released on the rural roads alone, when the Government has committed to a net Zero environmental policy.

1.2 The concept of workers on site (stated number =12) cycling or taking a minibus shuttle to work is unrealistic. A minibus would be uneconomical & not journey time practical as it is likely that any local workers would be distributed around the district also thus making journey times unacceptable. Cycling would be potentially dangerous, particularly in winter months. Thus workers would therefore drive, adding to vehicle movements. For example 6 workers travelling to & from work in separate vehicles add another 12 vehicle movements per day or approx. another 99000 over the project life cycle further adding to CO<sub>2</sub> & Nox emissions. The proposal for minimal site parking near to the access track entrance is unrealistic as it leaves a lengthy walk to get to the operational site, totally unacceptable in bad weather conditions for the workers. The proposed parking facilities for workers at the site entrance are therefore totally understated.

## **2. Road Traffic Safety concerns**

2.1 The width of the Loxwood Road in many places between the site access point & the A281 is insufficiently wide (5.1 meters to 5.5 metres quoted) to accommodate passing heavy vehicles with safety. Typical heavy lorries are 2.495 metres wide excluding wing mirrors – two passing lorries therefore will exceed the stated road width in many places. The proposal for the access track has been amended to include a 7.5 metre wide passing area - why then is a much narrower rural road deemed safe? The verges of this rural road between the access point to the site & the A281 are mostly not made up, thus continued verge damage over 33 years is highly probable. This represents a continuing hazard to all road users, including pedestrians, cyclist & equestrian riders, more so in bad weather conditions. The burden & cost of road maintenance over the proposed site operation period will fall upon WSCC & the taxpayer, this is unacceptable.

2.2 The proposal states that heavy lorries will only use the rural road from Bucks Green to the site. This is a fallacious statement as Loxwood Clay will have no control over the route that heavy vehicles will take – they can only request.

2.3 Even with the revised road visibility spay of entry & exit transitions to & from the site, an oncoming motorist with average reaction times would have approx 3 secs to react on seeing an oncoming exiting heavy lorry. This on a rural road with unmade verges, which is a situation that is potentially hazardous & life threatening. The statements regarding highway safety are unrealistic & hypothetical when taking common sense & real life human frailties into account & should be vigorously challenged.

2.4 Access to the local lorry network (A281) at Bucks Green will require significant & costly junction improvements to accommodate safe turning of 32 ton rigid wheel base lorries, particularly when going left towards Guildford through a severe angled left turn onto the main A281 at the end of a 1km (approx) straight fast section of the main A281 road.

## **3. Economic Benefit**

The proposal attempts to justify a financial benefit to the local area through the income of 12 people. This is a fallacious statement. There would be insignificant local economic benefit as it is highly unlikely that all 12 jobs created would be awarded to local residents, certain implied skills would be necessary for some job roles leaving only those unskilled jobs for local residents so little economic benefit to the community through derived income.

The net economic benefit of the proposal to WSCC & its residents will be negative, once the overall costs of the project are taken into account. Unquantifiable costs will include capital expenditure to ensure road safety through necessary junction improvements at the Bucks Green A281 intersection & regular revenue expenditure through maintenance costs of the rural road between Bucks Green & the proposed site due to heavy lorry movements consistently damaging road side verges.

In summary, the project has no net benefit to the local economy or West Sussex & has the strong probability of incurring on-going costs to the ratepayers of the County for many years to come. There is no justification in granting approval.

