

# Comment for planning application WSCC/030/21

Application number	WSCC/030/21
Name	Jennifer Cambell
Address	WILLOW BROOK, STANE STREET, STANE STREET, BILLINGSHURST, RH14 9AG
Type of Comment	Objection
Comments	<p>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.</p> <p>Claims by the applicant about the demand for clay and potential uses for it are questionable and unsubstantiated:</p> <p>Shortfall of clay in Surrey - no evidence submitted</p> <p>Creation of a new small brickworks (which would be subject to a separate planning process). The trend is for consolidation of brickmaking companies.</p> <p>Comparison with Ibstock Swanage is irrelevant</p> <p>They are owned by the largest UK brickmaker</p> <p>They have their own on site clay pit</p> <p>Potential customers for the clay - no specific customers named. Clay is a low value mineral and is uneconomic to transport.</p> <p>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.</p> <p>LCP also suggest Pitsham Brickworks is relevant but it is not as they use a different type of clay.</p> <p>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.</p> <p>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.</p> <p>The report to inform a HRA underestimates the distance that should be considered for Barbastelle bats foraging and commuting from the Mens Special Area of Conservation. Suitable habitat features are present across the proposed site and its immediate surroundings.</p> <p>The Bat Survey errs in referring to Horsham District wildlife and biodiversity policies. The site is in Chichester district.</p> <p>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.</p> <p>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.</p> <p>The additional information provided has not addressed the fundamental flaws in the original application and, given the detrimental impacts on the woodland and its surrounds, should be REFUSED.</p>
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Attachments	