

LETTER OF OBJECTION

Application No: WSCC/030/21

Loxwood Clay Pits Limited : “Clay quarry and construction materials recycling facility, Pallinghurst Woods, Loxwood Road, Loxwood, West Sussex RH14 0RW”

From:

CHARLES HARRISON, PARTNER, R.HARRISON & SONS, PALLINGHURST ESTATE OFFICE, RUDGWICK, WEST SUSSEX, RH12 3BQ

OBJECTION

Following the submission of additional information in respect of the above application, I register my further objection on behalf of R.Harrison & Sons in the strongest possible manner. For the avoidance of doubt, our original specific points of objection still stand.

The additional information submitted by the applicant continues to fail to address any of the fundamental policy, environmental or local community concerns, and, for the record, I fully endorse the multiple specific points of objection that have been expressed in significant numbers by other individuals.

Notwithstanding the above, you will be aware that R.Harrison & Sons are the adjoining landowners to the applicant.

We are referenced on multiple occasions within the applicant’s documentation and of most relevance, the applicant will require access across our land, specifically at PROW 795.

For the specific attention of the WSCC Planning Officer and the Planning Committee the following should be noted:

For the record, we confirm our agreement with the WSCC Public Rights of Way Office, Mr Darryl Hobden, as noted in his Consultation Response dated 11th August 2021 in which he confirmed:

“...Public Footpath 795 does not ‘run parallel’ with the private access as stated in the application documents. Rather Public Rights exist across the entirety of the width of this track. It is inaccurate to suggest the adjacent landowner [Bookham Harrison Farms] has therefore allowed the PROW to become overgrown and that users are no longer using the Public Right of Way. The applicant is advised that a public access right has precedence over private access rights...”

Therefore, any references by the applicant that walkers have been forced onto a different route by lack of maintenance on our part are wholly incorrect, pure conjecture and completely refuted.

The Planning Officer should also note that at this point, the line of PROW 795 dissects two fields, both of which are in constant use. Our livestock have free movement between these two fields and access for livestock across PROW 795 is a constant and perpetual requirement.

In summary, the applicant has completely failed to recognise this fact, nor have they made any proposal as to how they would safely manage the clear conflict between the 42+ HGV movements per day (which we believe is significantly understated) and our daily access requirements for livestock, farm machinery and personnel.

Further, with regards to any re-configuration of the PROW, the fencing either side, and the track surface, it is an incorrect assumption by the applicant that we would be prepared to co-operate in any way on this matter.

Finally, the applicant has also failed to take into consideration that the original purpose of the right of way as envisaged & granted is a significant point of contention.

Whilst some small and reasonable departure from the original use precedent (i.e. occasional vehicular access for forestry work) might be tolerable, the substantially different use, and the increase in scale that this development will cause is not.

Given the development plans represent significant change of use of the land, our position will be that the proposed increase in vehicle movements represent an unacceptable intensification of the right of way over the track and across our land. Whilst yet untested, the Planning Officer should note that we are seeking further professional advice in this matter.

I trust that the above points will be noted and urge rejection of this application.

Charles Harrison

Partner

R.Harrison & Sons