

**Objection to Planning Application WSCC/030/21 by Loxwood Claypits Ltd for planning permission for a clay quarry and construction materials recycling facility in Pallinghurst Woods, Loxwood Road, Loxwood, West Sussex, RH14 0RW**

Mrs Alison Sleeman, Ivyhurst, Loxwood Rd, Loxwood, West Sussex, RH14 0RW

I live at Ivyhurst, the house on the layby and nearest to the proposed site entrance. Our family has lived here for nearly six years and in the local area for 19. We moved here specifically for the tranquil and rural location and its subsequent lack of noise. Our youngest son has Autistic Spectrum Disorder, coupled with learning difficulties, extreme anxiety and hyper-sensitivity to noise. He relies upon consistency and predictability in his home life to give him the strength to tackle the outside world. He is in education for 17.5 hours per week, the rest of the time he is in the safely controlled environs of home. I strongly oppose the application to build a claypit/quarry and commercial waste recycling facility in Pallinghurst Woods.

**Need for Clay**

- According to the WSCC Monitoring Report 2019/2020, West Sussex currently has more than 25 years of clay reserves, so meeting local and national clay level requirements.
- If West Sussex doesn't need the clay it means it would have to be transported elsewhere, which is not financially viable.
- The applicant has mentioned a desire to open its own hand-made brick making facility locally. Wherever this were situated the distance involved would increase the carbon-footprint of the operation.
- If there is no need for clay, there is no justification to dig a hole/quarry and therefore nowhere for the construction and demolition waste to go.
- West Sussex currently has sufficient capacity for waste in far more suitable locations, running a recycling percentage higher than the 50% proposed by the applicant.

**Suitability of use**

- National policy states that waste sites should be sited in brownfield sites or built-up areas. Pallinghurst/Pephurst woods is neither. It is a peaceful, woodland habitat, home to a diverse range of flora/fauna.
- The proposed operation does not conform with the Loxwood Neighbourhood Plan or the Chichester District Local Plan for development in a rural area.

**Traffic and Road Safety**

- The proposed access route to the site is not a lorry network. Loxwood Road is rural, twisting and prone to flooding and black ice in winter. It is just 5.1m wide at its narrowest point and 5.5m along most of its length.
- In my view the significant increase in HGV traffic (300% more than present) represents a severe safety risk for existing users, including motorists, cyclists, walkers and horseriders.
- The road is rutted and prone to deep pot holes at the edges, which users will be forced into to avoid oncoming traffic which may be on the wrong side of the road.

- Despite the applicants claims it will be almost impossible to enforce HGVs coming from different directions to enter the site purely along Loxwood Road and I feel there will be a severe impact on the local villages of Loxwood itself, Tismans Common and Rudgwick.
- Equally the proposed site access/egress arrangements, whereby HGVs have to turn into the opposite carriageway, pose a severe risk to other road users.
- The possibility that HGVs will turn up at the same time and have to queue on Loxwood road itself, hence blocking it for others and reducing stopping times for those exiting the bends nearby, cannot be discounted. Due to its rural setting traffic is often held up by tractors, cyclists and horses, making even well scheduled timetables difficult to adhere to.
- There is a severe highway issue from HGVs entering and exiting Loxwood Road to/from A281 at Bucks Green. This junction is split between a side road running between The Fox Inn and James Paul car showroom and the natural end of Loxwood Road. The side road is used by most locals to turn onto the A281 as it affords greater visibility. Either junction entrance/exit is tight and only needs a parked car to block the road width and possibly cause a traffic jam backing on to the busy A281.
- 42 HGV truck movements a day for up to 33 years carrying skip waste from construction and demolition sites has the potential to damage listed buildings (often without foundations) along the proposed route, which contribute to the local landscape and rural character of the area.

#### **Layby Access and Safety**

- HGVs entering the site from Loxwood Road will have to drive past the Public Right of Way entrance into Pallinghurst/Pephurst Woods. Currently users park here to access the PROWs. 39m in it is proposed that HGVs will cross Bridlepath 3240 onto footpath 795 and will have “unfettered priority” (ES5.7) along the access route from the layby to the site. This is a huge public health & safety concern as hikers, young families with prams, dog walkers, cyclists and horseriders use this path. Children and animals are unpredictable and could well panic at the noise of HGVs when it is they who have a right to walk the path unfettered and breath fresh air as opposed to diesel fumes.
- Access to footpath 795 is not owned by the applicant, rather the farmer whose land it crosses. Locals who have walked the woods for in excess of 20 years can confirm that they have always used this main track, not a path to the side as claimed.
- In addition, in the applicant’s Environment Statement 8.17, it references an alternate route they considered but dismissed along a bridleway because “bridleway access rights do not allow widening of bridleways for HGVs or changes to surface”. Therefore in addition to public safety concerns there is a question of how to protect the bridleway from damage from HGVs.
- According to 5.13 of the Environment Statement “the layby will be reconfigured to the satisfaction of the planning authority”. The layby does not belong to the developers. Also point 10.24 admits that the plans submitted do not meet requirements: “the south easterly splays are 108.9m – less than the 114m required”.
- Point 10.28 states “By agreement with neighbouring landowners on Loxwood Road 200m either side of the layby regular trimming of hedgerows will be undertaken to maintain maximum visibility splay”. This cannot be guaranteed.

- Reconfiguration of the layby may reduce car parking for the general public and put them in danger from being run-over when exiting their vehicles or not being able to park at all.
- Reconfiguration of the layby represents a loss of visual amenity for members of the public who pass by every day and will not enhance, protect or complement the natural environment. The tall grass on the layby in summer hides any parked cars, won't hide HGVs, is great for wildlife and has established cherry trees near the proposed access that give pleasure to many. If it is to be widened, will these community planted trees be felled?
- Point 15.27 states that the entrance to Pallinghurst Woods in Pephurst Woods doesn't need to be widened and will be designed so as not to disturb any potential existing structures or the rubbish tip. It also states "hardstanding already exists which can be utilised for the required operations". I have seen this area in the past and in my opinion the existing hardstanding would need to be greatly expanded to accommodate the applicant's plans for a wheel wash and car park.

### **Wheel wash and staff car park**

- According to 5.4 of the Environment Statement a compound 100m from the main entrance containing a wheel wash and staff car park will be "agreed with planning authority pursuant to a condition of the planning permission". In my opinion such an essential safety issue should be part of the planning consultation. I can find no plans for this.
- This area will be used Mon-Fri 0800-18.00 and possibly Sat 08.00-13.00. Our garden backs onto this area roughly 20-25m away, depending on how large it will be. I believe that this represents an invasion of our privacy and will limit times my son can play in the garden to outside operational hours, when it's still light, which in winter will be never.
- As I understand it, wheel-washes are extremely loud and emit highly intrusive noise. To re-iterate, loud/unexpected/unusual noises can cause our child with ASD extreme physical discomfort, sounds equate to ear pain for many who have ASD. Pain causes anxiety which can trip serious meltdowns. This has an extremely serious effect on the state of his mental health and consequently that of the family.
- Our son is already nervous about playing in the garden as the developers/their agents can clearly been seen when in the area and he feels that he is being watched.
- It is proposed to be artificially illuminated during hours of winter darkness. In winter there is no tree cover to prevent light pollution/noise from affecting us. We can clearly see and hear the dog rescue teams when they park here when training, but this is intermittent, for a good purpose and not as loud as wheel-washing machinery.
- Mitigation planting is mentioned around the actual site but nothing has been specified to reduce noise levels from the wheel wash. Equally deciduous planting will be inadequate in winter.
- As with the main site diesel generators will be used, which will create pollution where there currently is none. The applicant states that electrification will be pursuant to planning, either resulting in the loss of more trees if granted, or continued pollution if not.
- Site opps 6.8 mentions mud control grids at the wheel wash and road sweeping on the layby. Both of these will contribute extra noise that has not been accounted for.

## Environment

- Pephurst Woods, the proposed site of the wheel wash and car park is an area of designated ancient woodland.
- The applicant states in 17.8 of the Environment Statement that “There will be short to medium term 2-40 years loss of trees and woodland and associated flora”. This is unacceptable in light of government policy and Chichester District Council’s Tree Scheme to plant 7,000 trees to combat climate change.
- Felling trees on the proposed site of the waste operation/quarry/lagoon would cause an immediate loss of biodiversity. There are currently no buildings within the woods and the construction of a 15,000sq ft operation hub will have a significant visual impact on the landscape.
- HGV traffic along the access track will damage the lateral root systems of nearby trees, hindering their ability to absorb rainfall. According to the Woodland Trust, 100 mature trees can intercept about 100,000 gallons of rainfall per year.
- 19.2.4 cites the Protection of Badgers Act which states that disturbance is illegal within 30m of an active sett. There is an active sett near the proposed wheel wash area, clearly visible from footpath/bridleway 3240 that has not been accounted for.
- 19.3.5 states that features on adjacent land (over 30m from the site and access) “may be affected by noise, dust, artificial light, hydrological changes or human activity during construction and operation”. This represents over 30 years of disruption to a currently tranquil setting, home to slow worms, endangered butterflies, bats and nightingales, deer, birds, invertebrates, wild orchids and carpets of bluebells, enjoyed by many for recreation, exercise and mindfulness.

In summary, I urge you to reject planning permission for this operation which I believe is vehemently opposed by and offers no benefits to the local community. Indeed on a webinar the applicant’s representative asked “why should it benefit the community?”, I ask why should it be to our detriment?