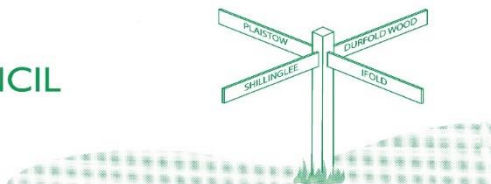


PLAISTOW AND IFOLD PARISH COUNCIL



20th August 2021

County Planning,
West Sussex County Council,
County Hall,
Chichester,
PO19 1RH

To whom it may concern,

Re: WSCC/030/21 | Pallinghurst Woods, Loxwood Road, Loxwood, West Sussex RH14 0RW | Loxwood Clay Pits Ltd

Plaistow and Ifold Parish Council's Planning & Open Spaces Committee considered the above application at its meeting on 18th August 2021 and objects to the proposals in the strongest terms.

From the outset, it is imperative that the Planning Officer recognises that the water supply in the Loxwood area is highly stressed and a critical factor to be considered when determining this application which cannot be ignored. This application will inevitably exacerbate the current water situation in the area.

Plaistow and Ifold Parish Council respectfully refers the Planning Officer to the open letter of Mrs Janet Cheesley, Chartered Town Planner specialising in the examination of Neighbourhood Development Plans and currently undertaking the independent examination of Plaistow and Ifold Parish's Plan. The letter is attached for ease of reference.

You will note that Natural England has concern over the accumulative impact on fresh water supplies in the North Sussex area from unsustainable extraction at Hardham in Pulborough and the potential adverse impact on the sensitive Arun Valley, which has Special Protection Areas (SPA), Special Area of Conservation (SAC) and Ramsar designations. **This statement from Natural England came out of a review of Loxwood Parish Council's Neighbourhood Plan.**

The ramifications of Natural England's statement are far reaching and impact Chichester District Council's Local Plan generally. Consequently, the Parish Council respectfully requests that the Planning Officer contacts Valarie Dobson, Principal Planning Officer at Chichester District Council, to ascertain the significant ramifications of Natural England's statement and the content of this open letter on CDC's Local Plan and the legal advice the District Council are currently seeking. Ms Dobson's email address is: vdobson@chichester.gov.uk

The Parish Council has seen no compelling evidence to support the application that there is a legitimate business need for clay in this area. The Parish Council has considered the latest WSCC Minerals Monitoring Report, which states that there is no demand for additional brickmaking and WSCC have more than 25 years of reserves. Additionally, the clay requirements are met both nationally and locally due to other sites with ample supply. The Parish Council notes that clay extraction typically takes place adjacent to brick making facilities and it is considered uneconomical and environmentally impactful to transport clay over any distance. For these reasons, the Parish Council considers that the application is disingenuous and that the primary purpose of the business will be waste transfer and landfill. However, as is the case with clay extraction, there is limited requirement for a construction and demolition waste site in West Sussex either, as the need is met at other far more suitable sites.

The site is remote and tranquil with limited light pollution and characterised by designated ancient woodland (Pephurst Wood) which supports a raft of wildlife including one of the area's priority bat species, the Barbastelle Bat (which is an International European Protected Species). The site is manifestly unsuitable for the proposed operations and the Council notes the lack of reference in the application to an active badger sett near to the proposed lay-by, parking, and wheel wash area at Pephurst Wood. The Parish Council wishes the Planning Officer to be aware that the site was part of the West Weald Landscape project.

The Parish Council recognises that without the mineral site there would be no justification for a waste site at this unsuitable location. National policy does not support this type of development on a greenfield site and specifies that waste sites should be sited in built-up areas or brownfield sites. Additionally, the proposed development is entirely contrary to either the Loxwood Neighbourhood Plan, or the Chichester District Local Plan: Key Policies 2014 - 2029 for development in a rural area and violates, among others, Policies 25, 40, 45, 48 and 49.

No part of the application is sensitive to the setting in terms of size, bulk, and location. The Parish Council notes the proposal for a 15,000 sq ft building situated within unspoilt woodland, along with the ancillary building and quarrying operation all of which will have a serious and lasting visual impact upon the landscape which has no other structures. It does nothing to enhance, protect or complement the natural environment or rural character of the area and realises no demonstrable benefits to the local and wider communities. The development will generate impactful light pollution, environmental pollution from plant equipment, generators, excavators and vehicle movement and intrusive noise to the detriment of wildlife, those who use the public footpaths and live-in nearby communities.

The Council has seen no verifiable evidence that suggests that the lasting damage this development will cause to the natural environment and local communities is outweighed and/or mitigated by a legitimate business need for any part of the applicant's proposed operations at the site. At a time when preventing and/or mitigating climate change and protecting the natural environment is critical, it is manifestly inappropriate to countenance the approval of an application which will result in an increase in net carbon emissions from the burning of fossil fuels, removal of tree canopy by felling and disturbance of the woodland floor for corporate profit only. Particularly when the proposed operation

is contrary to industry standards which considers the transport of clay over any distance to be both uneconomical and environmentally impactful.

The Parish Council has significant concerns regarding the increased volume of traffic the proposal will generate. 42 HGV movements per day along narrow country lanes with relatively poor infrastructure and away from the primary road network is unacceptable and will impact multiple communities, including Plaistow and Ifold, and cause a significant increase in road safety concerns and negative residential amenity. Many of these roads do not benefit from pavements and visibility can be poor due to vegetation. The roads are used by pedestrians, cyclists and horse riders of all ages and abilities and frequently host large scale cycling events throughout the summer months.

This volume of HGV traffic will be detrimental to the tranquil and isolated location of both the site and our rural villages. The Parish Council respectfully requests that the Planning Officer does due diligence to satisfy themselves of the suitability, sustainability and safety of this increased level of HGV movements in this area. This application for development should not be considered in isolation; to do so would be manifestly irresponsible. The application must be considered alongside all the other planning applications in the area (of which there are a large number from both Horsham District Council and Chichester District Council for substantial residential development sites) and the cumulative impact the increased traffic will create on the road networks and road safety.

The Parish Council notes that the applicants only plan on recycling 50% of the waste brought onto site – an amount well below the accepted industry standard. If they subsequently decide to increase the recycling rate this will inevitably result in an increase of HGV movements.

Yours sincerely



Catherine Nutting

Clerk & RFO to Plaistow and Ifold Parish Council

cc. WSCC Cllr. Janet Duncton and District Cllr. Gareth Evans

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