

**From:** [REDACTED]  
**To:** [PL Planning Applications](#)  
**Subject:** WSCC/030/21 - SOS letter of objection  
**Date:** 30 August 2021 07:25:20  
**Attachments:** [REDACTED]

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Attached is a letter from the Sussex Ornithological Society (SOS) objecting to this development proposal.

We would like to be kept informed about the progress of this application.

Thank you

Richard Cowser  
(SOS Conservation Officer)



# SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

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30 August 2021

By email only: [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)

Hello,

## WSCC/030/21- Proposed Pallinghurst Wood Clay Pit

The Sussex Ornithological Society **objects** to this  
*“application for planning permission for a clay quarry and construction materials recycling facility (CMRF) for CD&E wastes including the use of an existing access from Loxwood Road, the extraction and exportation of clay and restoration using suitable recovered materials from the CMRF to nature conservation interest including woodland, waterbodies and wetland habitats”*

In the words of the *Results of surveys for Flora and Fauna* “[there is quite a rich breeding and wintering bird assemblage](#)” with 6 red/Amber breeding species and 4 section 41 species, and in winter 8 Red/Amber species, 4 Section 41 species and 2 Schedule 1 species.

One of the species that will be affected is the Red listed Common Nightingale, of which we have a record from 2021 which the applicants will not have seen. This record is from right beside the access road at TQ048324 where one bird was heard singing on 24 April 2021 (SOS record number 6396893)

Whilst we realise that the proposal is to restore the site in a way that could provide biodiversity gains, including a small pond, this will not happen for 33 years, so there will be a 33 years of biodiversity loss during the time the site is being worked. It is our view that because of this time lapse the loss of biodiversity from say 2022 to 2054 should be given much greater weight when deciding this application than any possible gain from 2055 onwards. For this reason we also feel that any reference to “temporary impacts” (meaning impacts that will last at least 30 years throughout the extraction and infilling process) should be regarded as long term impacts.

The application recognises that Nightingale and other breeding birds will be affected. In mitigation they propose that 2.8ha of conifer plantation will be converted to deciduous woodland. Whilst this would be welcome, it would take at least 30 years for such woodland to mature to anything like the level of woodland that will be lost on site. Consequently we do not regard this as mitigation that will benefit breeding birds during the operational period of the proposed claypit. However, we would like to see it go ahead as it will mean that there is some compensatory habitat coming on stream in 30 years time. We would however, prefer it to total 8 ha rather than 2.8ha, as some 8 ha of deciduous trees will be lost at the claypit.

It is also proposed that [selective rotational thinning and subsequent rotational coppicing will be carried out in other deciduous woodland to provide additional](#)

*breeding habitat for breeding birds, including Nightingale.* Nightingale require thick undisturbed bushes in which to nest, so thinning is not going to be effective. Were coppicing to then be carried out it would take at least 10 years before the coppiced trees might have thickened up enough to be of interest to Nightingales, and if it were to take two cycles of coppicing for them to thicken up sufficiently twenty years would be needed. Therefore, our feeling is that such a project would take far too long for it to be considered able to provide effective mitigation for Nightingale.

Therefore, we do not believe that the proposed mitigation measures will be effective unless they are put in place immediately and the clay extraction does not begin until they have taken effect, which in terms of replacing conifer with deciduous woodland will take at least 30 years. Rather we believe that there will be an immediate impact on significant species of breeding and wintering birds, including Nightingale with no adequate mitigation measures being put in place.

For this reason we object to this application.

Yours sincerely,

Richard Cowser  
(SOS Conservation Officer)