

## **WSSC COUNTY ARBORICULTURAL OFFICER response to planning consultation**

**Application reference number:** WSSC/030/21

**Location:** Pallinghurst Woods, Loxwood Road, Loxwood, West Sussex RH14 0RW

**Proposal:** An 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

**District:** Chichester

**Date:** 27<sup>th</sup> August 2021

**Summary response:** objection

**Response:** Paragraph 2.5 of the planning statement: *'... much of the site contains little of any arboricultural significance...'* yet the tree survey has categorised all individuals (except T95 and T96) and groups as either A or B within the red line and extended survey area. Category A and B trees and tree groups would be lost as a result of the proposal.

Paragraph 5.4 states that *'All of the trees that will be retained on site will be protected for the duration of the works according to BS5837 **as far as it is practicable.**'* (my emphasis) This does not provide assurance that all retained trees will be protected in accordance with BS5837. A tree retention and protection plan has not been submitted.

Page 69: *'...the development will remove 6ha of previously utilised commercial forestry...'* but only part of the site is described as established plantation.

### Extraction site

The flora and fauna survey results state that all deciduous woodland is considered to represent relatively high-quality lowland mixed deciduous woodland priority habitat, due to the structure and species composition (DW1, DW2, DW3, R1, R2, R3). Primarily DW1 and DW3 would be removed for development where there are frequent mature trees. Deciduous plantation – P3, P4 and P5 have a rich field layer and are developing towards priority habitat. P4 is ancient, replanted woodland. P1 and P2 are established broadleaved plantations and probably meet the lowland mixed deciduous woodland priority habitat definition.

### Proposed access route

DW4, DW5, R3 and R4 are lowland mixed deciduous woodland habitat of priority importance. P6 and P7 are developing towards priority habitat. Hedges H1 and H2 are hedgerow priority habitat and defined as important under the Hedgerows Regulations 1997.

Although there is a proposed habitat and enhancement strategy together with a CEMP and LEMP (content unknown), the EcIA nevertheless concludes that

*'significant residual effects are predicted'*. For example, for invertebrates (many dependent on the varied niches provided by trees, including unique decay stages) there would be *'permanent reduction in diversity and abundance of invertebrate fauna.... likely displacement of invertebrates from adjacent habitats and possible fragmentation of habitats used by butterflies, in particular wood white and white admiral.'*

There would be direct loss, degradation, and fragmentation of habitat; *'a permanent reduction in woodland extent which is irreversible'*.

The Pallinghurst Wood complex has importance at the landscape scale, in terms of size, habitat quality, the fauna and flora assemblages dependent on that habitat, and, significantly, connectivity. (The AIA states that *'the woodland is very well connected'*).

The proposed development has a direct impact not only due to the clay extraction process, but also through the installation of a CMRF, hardstanding, other welfare facilities, trenching for services, layby creation, improved visibility splays, a new access road (5.6.10 of AIA) and resurfacing tracks.

Impacts are not restricted to the direct footprint of the proposal; edge effects can extend well beyond this – some species are particularly sensitive to disturbance and artificial light. Paragraph 5.3.3 of the AIA states that *'a strong evidence base does not exist regarding the potential impact of anthropogenic noise on non-marine UK protected species and their habitats'* but does not provide the reference to this study. The 33-year length of development also prolongs adverse impacts.

Biodiversity net gain is not achieved. The proposal results in a net loss of 35.77 biodiversity units which is equivalent to -36.59%.

The *'interventions'* (new habitat creation, enhancement) are outweighed by the impact of the development on semi-natural broadleaved woodland which is a Habitat of Principal Importance.

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