



Sussex
Wildlife Trust

Contact: Jess Price

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Date: 2 February 22

By email only

FAO: Chris Bartlett

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Dear Mr Bartlett

Planning Application Reference: WSCC/030/21

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

Thank you for consulting the Sussex Wildlife Trust (SWT) on the further information submitted for the above application. We have looked at the 'Additional Information and Response to REG25' document and unfortunately it does not allay our significant concerns about the application and our objection stands. SWT of course supports the wider woodland being brought into positive management for wildlife, however this cannot outweigh the loss of the physical extent of priority habitat and its underlying soils, particularly woodland DW1.

We agree with the WSCC Ecologist's comments that it is unclear that the significant loss of habitat could be compensated for, let alone able to achieve a net gain. We note the applicant's comments about the Environment Act transition period, but remind WSCC that the requirement for all development to deliver biodiversity net gain already exists within the NPPF and has done for several years (paragraph 174). We also note that a woodland management plan that involves some thinning and felling is very different from a proposal, which fells trees and digs out soil. Especially when the vision for that plan states that 'silvicultural interventions will be small-scale, focusing on releasing ground flora to promote natural regeneration, with a greater diversity of species and age-class structure'.

The Additional Information states that consultees have ignored further enhancement of 300 acres of woodland that was not included in the Defra metric, because it only considers mitigation within the planning red line boundary. However, Appendix ES W shows that the BNG calculation did include off-site enhancements within the wider blue line boundary and that the proposal still results in a net loss of 36.59%. If further enhancement of a wider area is proposed, the metric should be re-run with the totality of habitat lost, created and enhanced, both onsite and offsite, included.

SWT notes the confirmation in the response to Natural England that the easternmost passing place falls within Ancient Replanted Woodland, but that mature trees will be avoided. However, we are still concerned about the direct and indirect impacts cause by the passing place, especially in terms of compaction and erosion of soil and pollution from vehicles. Table ES 2 notes that a 15m buffer is required to protect the ancient woodland at the north-west corner, but does not acknowledge the same need for the ancient woodland impacted by the passing place. We remind WSCC that in policy terms both semi-natural ancient woodland and plantation on ancient woodland receive the same level of protection due to their equal recognition as irreplaceable habitat.

Yours sincerely,

Jess Price
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