

**Application Number**

WSSC/030/21

**Location**

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

**Proposal**

An application for planning permission for a clay quarry [...]

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**Ecological response to applicant's additional information**

The applicant's response lacks a detailed explanation as to the erring, and there are no specific questions to answer. However, I've tried to respond to the spirit of the rebuttal.

Matters relating to water neutrality will be reviewed separately as part of the HRA process.

The primary purpose of the proposals is not conservation, this is not an enabling development; whilst it might be the case that should application be refused the owner will be unable to maintain the wider woodland despite previous investment as per para 8.9, the application is for the winning and working of minerals within the redline boundary and not to maintain or improve ecology. The proposed activity results in the loss of a good quality woodland for a significant period, a habitat listed under S41 of the Natural Environment and Rural Communities Act 2006. The basic point remains that a 'relatively high quality' S41 habitat will be removed for an extraction activity for which there is no immediate strategic county need.

I'm not clear on the point being made on the metric 2 vs 3. Metric 3 replaced Metric 2 on 07/07/2021 with beta versions available before then. The biodiversity unit values metric 2.0 generates will differ from those generated by Biodiversity Metric 3.0 and my reference to it offered the applicant a chance to review the conclusions.

With reference to my consultation response (second paragraph) it is unclear what contribution s22.49 will make to the compensation for overall habitat loss. The application has yet to cross the 'no net loss' threshold and has not demonstrated net gain. There is no evidence to support the conclusions reached in s22.49.

Section 7.6 onwards is 57 pages to section 8, is there something more specific I could respond to? If the point is that I am incorrect in my assumption that there is no overriding need (overriding the long-term ecological interest of this site), for additional clay then I disagree. If I have mis-interpreted the JLMP then I will defer to the relevant Planning / Policy Officers

The FC plan isn't a mitigation plan for the loss woodland to a clay extraction, it serves a different purpose

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