

# Save West of Ifield Regulation 19 Response<sup>1</sup>

## Policy HA2 and the Allocation of Land West of Ifield

### Green Infrastructure and Biodiversity

#### Summary

1. Introduction
2. Policies and guidance relevant to the topic area
3. The evidence base

#### Glossary

#### Annex: Maps A and B

#### Supporting documents (appended to main report as part of this merged document)

- A. Priority species and habitats
- B. Bechstein's bats
- C. 2023 EIA Scoping Opinion Request – Authors' Response

*'The heavy Wealden clay covering most of our area is not favourable for large scale arable agriculture therefore field sizes have remained small. Ancient Hedgerows and mature hedgerow trees, particularly Oaks have remained intact and the area contains numerous small copses which are all well connected. Large amounts of ancient/semi-ancient woodland also survive as do small field ponds. This mosaic of landscape features is crucial for the Bechstein's to survive and prosper.'* Martyn Cooke – Surrey Bat Group

*'The small fields between House Copse and Hyde Hill Wood [are remainders of] the lovely landscape pattern - typical Wealden landscape of small copses and fields with ancient hedgerows between. So much of this medieval landscape has gone now, and it is awful to think of this bit now being destroyed. The whole area should really become a country park, a green lung for the ever-expanding Crawley and Horsham.'*  
Frances Abraham – Sussex Botanical Recording Society

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<sup>1</sup> This report has been prepared on behalf of the Save West of Ifield residents' group, by Peter Townend and Fenella Maitland-Smith.

## Summary

### Main points:

- The allocation of the West of Ifield site renders the Local Plan unsound in respect of NPPF paragraphs 31, 35, 174, 179 and 180; and
- If the West of Ifield remains in the Plan then Policy HA2 needs strengthening and correcting to ensure that the NPPF and HDC Policy 17 will be complied with, although given the scale and impact of the development it's hard to see how compliance could be possible or viable.

### **The decision to allocate WOI is not based on a sound understanding of the characteristics and value of the site and surrounding area (NPPF paragraphs 31, 35, 179).**

- i. Nothing is presented in the Plan or Evidence Base to suggest that the allocation of the WOI site has been informed by specific survey data, consultation with wildlife groups neighbouring authorities or any other sound evidence regarding biodiversity value or amenity value. It appears to have been entirely a desk-based exercise. It seems that all surveying is to be left to Homes England (HE), which, judging by the EIA Scoping Request has only been done partially for the site itself and not for the adjacent LWSs. An FOI request to HDC has failed to establish the extent of any surveying and whether HE have shared survey data with HDC to support their decision-making. Our requests to HE for permission to conduct hedgerow or other ecological surveys have been refused;
- ii. *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision"*<sup>2</sup> To determine whether the site is deliverable and to understand the potential capacity for development, Ecological site appraisals should be undertaken.
- iii. A historical lack of recording of the area means that its true biodiversity value is unknown. To the extent that HE have made public some of their survey findings – for bats, and a summary statement for invertebrates – it appears that the biodiversity, and presence of priority species, is much higher than expected. This underlines the need for much more surveying and consultation before HDC finalises its decision to allocate the WOI;
- iv. HDC's assessment and understanding of existing and potential biodiversity value across all Strategic Sites is inadequate and so the scoring and comparison of the sites in the SA is highly questionable – see discussion of Strategic Site Assessment and Sustainability Appraisal. SWT responded to HDC's Regulation 18 consultation *'the plan should not be taken forward as the significant effects on biodiversity remain unquantified and poorly understood. Whilst any level of development has the potential to negatively impact on biodiversity, SWT believes that the conclusions of the SA are heavily influenced by the generalised nature of the assessment. ... the lack of sufficient up to date information on the District's ecological assets and particularly the wider networks exacerbates this issue'*.
- v. Similarly, the lack of understanding of impacts means that the requirements in HA2 are weak and in some cases unachievable – see suggestions for strengthening HA2; and

### **A major concern is that HDC and HE are underplaying the high biodiversity value of the WOI site and surroundings (NPPF 174, 179, 180).**

- vi. The West of Ifield site is bordered by a number of designated areas, irreplaceable habitats, and is in close proximity to many others. See Map A. Nowhere in the Plan or Evidence Base is there a comprehensive and accurate list of all of these assets. References to some areas are made in HA2, the SSA, the SA and the EIA;

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<sup>2</sup> Government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System 16 August 2005 <https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005#:~:text=Details,and%20the%20Planning%20Practice%20Guidance.>

- vii. Homes England's EIA Scoping Report, and HDC's response to it, omit to mention that Ifield Golf Course falls entirely within the Rusper Ridge BOA, despite this having been pointed out to them several times in the past;
- viii. Homes England's identification of Bechstein's bat roosts at the centre of and on the boundaries of the site is acknowledged in HA2 and the SSA, but HDC's response to this and the requirements on HE and developers are inadequate. The fact that these highly protected bat species are roosting and feeding in and around the site and across the border into Surrey illustrates how the area is under-recorded, under-designated and under-protected. And a compelling case for much more effective cross-border collaboration.

**HDC and HE are also disregarding some of the key impacts of the development.**

- ix. There is no requirement in HA2 to minimise the impact of the road (Multi-modal Transport Corridor) and the effect it will have on habitats and corridors, in particular the River Mole. This applies both for the 3,000 and 10,000 house proposals;
- x. The fact that Ifield Brook Meadows Local Wildlife Site will become isolated – surrounded by housing – is not acknowledged, despite being raised as a concern by SWT. In its response to the 2020 scoping request, Sussex Wildlife Trust said: *'SWT is very concerned about the impacts on Ifield Meadows LWS as presumably it will be surrounded by development. No comment has been made as to how this will impact on its functionality within the District's wider ecological network.'* The severing of all connectivity to the countryside is not mentioned. Neither is HE's plan to criss-cross IBM with cyclepaths and footpaths, to facilitate the shortest non-road access to Ifield station and shops;
- xi. The NPPF requires that Plans should *"Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them"*. The Plan should be informed as to where these networks exist and needs to take account of the location of proposed highway improvements and whether they can be achieved; and
- xii. The Sustainability Appraisal scores West of Ifield significantly more positively than other sites for biodiversity, on the assumption that the requirements and mitigations in HA2 will be much more effective than the requirements for other sites. This assumption is itself based on a lack of understanding of the site, its biodiversity and the impact of the development. It's hard to see how the scoring can be in any sense robust given the lack of data.

**The requirements in HA2 are too weak to prevent significant biodiversity loss from the site and surroundings given the scale of the development, and do not propose adequate mitigation for protected species and habitats (NPPF 179, 180).**

- xiii. It's not even clear that HE or developers are required to produce and implement robust and detailed management plans to 'protect and enhance' these assets. We provide comments and suggestions for strengthening.

**The lack of evidence and survey data raises serious concerns about how the baseline biodiversity value will be determined for future BNG calculations. It would be particularly concerning if all the assessment were to be entirely in the hands of Homes England or developers.**

**HDC's apparent lack of consultation and cooperation with neighbouring authorities is a serious issue (NPPF 174).**

- xiv. There is no evidence that HDC is working with Mole Valley DC, which is a concern given the site and surroundings are an important part of the Mole catchment, and form part of the wildlife corridors running north-south along the Mole Valley into Surrey. The fact that the River Mole rises just outside Rusper village and that much of Rusper parish is in the Upper Mole Valley is barely acknowledged by HDC; and
- xv. There is no evidence to suggest that HDC or HE have consulted Crawley BC about plans for or management of Ifield Brook Meadows. Or the impacts on Willoughby Fields LNR and other LWSs. The CBC Local Plan explains IBM's status as a Local Green Space and the importance for the local community, but this is not mentioned by HDC.

**There is no mention in the Evidence Base of HDC having consulted Sussex and Surrey Wildlife Trusts, or the Gatwick Greenspace Partnership.**

## **1. Introduction**

This representation comments on the soundness of the Plan, in particular Policy HA2, as well as identifying instances where policy HA2 should be more specific, be better informed by data and evidence, and should be expanded to cover all key impacts.

The strategy to allocate the West of Ifield is assessed for compliance with the relevant paragraphs of the NPPF, ie 31, 35, 174, 179, and 180.

In particular, the Local Plan policies, and supporting documents in the Evidence Base have been assessed to establish whether the allocation of the West of Ifield has been based on a sound understanding of the characteristics of the area.

Although Homes England are currently promoting plans for 3,000 houses West of Ifield, and this is the basis of HA2, they have made clear previously to HDC and in public presentations their aspiration to develop a masterplan for 10,000 houses and a Multi-modal Transport Corridor (MMTC) from Faygate through Lambs Green to Manor Royal / Gatwick. See Map A in the Annex. This 'wider vision for the area' is also explained in the Local Plan (10.84).

While the Evidence Base and in particular the Sustainability Appraisal only addresses the 3,000 house proposal, there are arguments for also considering the impacts of the wider aspiration, and this was the view of HDC in response to HE's 2020 EIA Scoping Request. One of the arguments is the fact that House Copse SSSI would sit right in the centre of the 10,000 house development, with the road (MMTC) passing within metres. The impacts on the SSSI and the surrounding network of ancient woodland and hedgerows would be disastrous, breaking important existing wider ecological networks. While this representation focuses on the impact of HA2, it also makes reference to the key impacts of the 10,000 proposal with Full MMTC.

A number of associated documents have also been submitted to support the points in this report.

## **2. Policies and Guidance relevant to the topic area**

### **NPPF, September 2023<sup>3</sup>**

A fundamental principle of the planning system is that decisions should be evidence based, and that the level of information made available to support good decision-making should be proportionate to the scale, scope and significance of the development or policy under consideration.

**Paragraph 31** *'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, ...'*

**Paragraph 35** sets out tests of 'soundness' for Local Plans and emphasises that strategies must be appropriate *'taking into account reasonable alternatives and be based on proportionate evidence.'*

**There is nothing in the Local Plan or Evidence Base to show that, to the extent that habitat and biodiversity has been material to the plan-making, the choices made between strategic sites and the decision to allocate the West of Ifield has been based on, or is supported by, any ecological survey data or analysis.** No such data or analysis has been made public. Nor evidence of consultation with neighbouring authorities, local wildlife groups or local naturalists and communities. The decision-making and the scoring and comparison of the various sites in the Sustainability Appraisal, in terms of biodiversity appears to be based on nothing more than (very partial) records in the SxBRC and DEFRA's Magic tool.

**Paragraph 174** *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies*

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<sup>3</sup> <https://webarchive.nationalarchives.gov.uk/ukgwa/20230929144819/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

*in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*

Paragraph 174 is also contravened by HDC's apparent lack of any '*plan[ning] for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'* **There is no evidence of any engagement with Mole Valley DC, Crawley BC, Surrey Wildlife Trust or with the Gatwick Greenspace Partnership in respect of protecting Ifield Brook Meadows LWS, or enhancing the wildlife corridors running north along the River Mole through Rusper parish into Surrey.**

In terms of taking a strategic approach, HDC presents a Green Infrastructure Strategy / Study document, but this does not provide evidence of a strategy which will maintain and enhance networks. Similarly, while the Wilder Horsham District initiative does enhance habitats it focusses on isolated pockets of land and is resident-led with no evidence of planning at a catchment or landscape level.

**Paragraph 179** *'To protect and enhance biodiversity and geodiversity, plans should:*

- a. *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b. *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*

**Neither Policy HA2, the Evidence Base or Homes England's EIA reassure that the designated sites in close proximity to the WOI will be protected and enhanced. There is no evidence that HDC has commissioned any ecological surveys to determine where development can be located. And HDC has shown little or no understanding of the site or surrounding area. The impact of WOI will contravene NPPF 179.**

**Paragraphs 180b and 180c** are also relevant for the allocation of the West of Ifield site in the Plan:

- **180b** *'development ... within or outside a SSSI which is likely to have an adverse effect on it ... should not normally be permitted.'*
- **180c + footnote 63** *'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland...) should be refused, unless... wholly exceptional reasons and a suitable compensation strategy exists'*

**Due consideration is not given to the potential effects of both the 3,000 and 10,000 proposals on House Copse SSSI and the network of ancient woodland and hedgerows around it.**

## **Local Plan Strategic Policy HA2**

**HA2 Box – page 159 onwards.** Policy points 4.a. to 4.g. are positive and clearly aim to protect and enhance the local biodiversity. We do however have a number of concerns and comments:

- i. Nothing is presented in the Plan or Evidence Base to suggest that the allocation of the WOI site has been informed by specific survey data, consultation with wildlife groups or any other sound evidence regarding biodiversity value or amenity value. It has purely been a desk-based exercise. It appears that all surveying is to be left to Homes England and judging by the EIA Scoping Request has only been done partially for the site itself and not for the adjacent LWSs;
- ii. Consequently, the policies in HA2 show a lack of understanding of the biodiversity value and amenity value of the WOI site and surrounding area, indicating that HDC have not looked closely at, surveyed or considered in detail the habitat, biodiversity or character of the area;

- iii. The West of Ifield site is bordered by a number of valuable and irreplaceable habitats, and is in close proximity to many others (Map A), all of which require robust and detailed policies to protect them. But the requirements in HA2 are too weak to prevent significant biodiversity loss given the scale of the development, and do not propose adequate mitigation for protected species and habitats. Comments and suggestions for strengthening are given below;
- iv. The requirements in HA2 are not specific enough – they should identify and list the valuable habitats and priority species already identified, and make clear that developers are required to deliver management plans for these habitats and species;
- v. There is no policy with regards to minimising the impact of the road (MMTC) and the effect it will have on the habitats it crosses. This applies both for the 3,000 and 10,000 house proposals;
- vi. In their response to the EIA the Horsham ecologist raised the possibility that the site could be considered as a Special Area of Conservation (SAC) given the presence of Bechstein's bats, and until this has been evaluated the Plan should not be approved;
- vii. The lack of evidence and survey data raises serious concerns about how the baseline biodiversity value will be determined for future BNG calculations. Baseline data need to be comprehensive, current and verified. It would be particularly concerning if the assessment were to be entirely in the hands of Homes England or developers; and
- viii. The Plan overall contains no policy on minimising the habitat loss and disruption during construction.

**Suggested changes to Policy HA2 Box 4.a – g (additions **bold and underlined**)**

4. Proposals must **protect the existing biodiversity** and provide a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Gain Plan, to demonstrate how a minimum 10% net biodiversity gain will be achieved on the site, and in particular demonstrate:

a) that the **integrity of Ifield Brook Meadows Local Wildlife Site and Local Greenspace is conserved and the biodiversity enhanced, ensuring an appropriate buffer that maintains and provides wildlife corridors to other important wildlife sites;**

Strengthening of the policy is needed because:

- Ifield Brook Meadows LWS has a high biodiversity value but will be sandwiched between the most densely built part of the proposed development and the urban edge of Crawley (Map A). The HE proposals for cyclepaths and footpaths, and even a playground, do not protect and enhance the site. The policy should specify that the integrity of the site should be maintained with no new pathways access points or crossings to ensure that the existing ecology is not impacted. Specific Example: The site will be cut in half by the pathway west/east which terminates at Rudgwick Road, Ifield. See Sup Doc A - Priority habitats and species;
- The connectivity of the LWS – particularly the corridors to the west – will be harmed, and could be destroyed by the WOI development;
- Ifield Brook Meadows currently form Crawley's only remaining rural fringe, are designated by CBC as a Local Green Space and are enjoyed by walkers and naturalists, as well as protecting the character and views to and from the Ifield Village Conservation Area and Grade 1 St Margaret's church. Additional access and extra footfall would impact the relatively undisturbed 'wild' nature of the LWS / LGS. See Sup Doc A;
- A management plan which covers the specific habitats and priority species of Ifield Brook Meadows should be required as part of the policy. It is worrying that Homes England are not as yet scoping Ifield Brook Meadows into their EIA; and
- 'An appropriate buffer' is not a specific enough statement of policy and HDC should provide more specific guidance with a reference to follow recommendations from ecologists. Ifield Brook Meadows would need to be increased in size and linked to other sites via existing and new wildlife corridors to achieve BNG on site.

b) that the Ancient Woodlands and **important Hedgerows at Ifield Mill Stream LWS, Hyde Hill LWS, The Grove, House Copse SSSI, Willoughby Fields LNR and Ifield Wood** are protected and enhanced, ensuring an appropriate buffer;

Strengthening of the policy is needed because:

- It fails to mention all the ancient woodlands and hedgerows which will be impacted. The omission of the ancient woodland of House Copse SSSI is particularly surprising, as is the omission of Willoughby Fields LNR. See Sup Doc A for more detail;
- Apart from the SSSI these woodlands are so close to the development that they will be impacted by additional footfall, particularly given HE are promoting access to these areas of countryside as a benefit for new residents;
- The absence of any buffer zone guidance in the policy will allow the developer to build too close to these sites.

Specific Examples: House Copse SSSI is missing from the list of sites, this is close (650m) to the south west of the site and an important Ancient Woodland.

c) the delivery of a biodiverse River Mole Linear Park, which protects and enhances the riparian ecosystems along the River Mole corridor **and protects or creates wildlife corridors to other wildlife sites in the area;**

Strengthening of the policy is needed because:

- There is a risk that the Linear park will simply amount to a buffer on either side of the river. To really protect and enhance ecosystems will require corridors along, and leading away from, the river. It will also require effective cooperation with Wildlife Trusts, the Gatwick Greenspace Partnership, Crawley BC and Mole Valley DC. This cooperation should be specified in HA2;
- The habitats and species associated with the River Mole and Ifield Brook are not acknowledged sufficiently in the Plan, Evidence Base or the draft EIA. They should be subject to separate detailed assessment and discussed in a dedicated section of the EIA. The streams of the Upper Mole run through and around the site, and are very important ecological features, particularly in terms of habitat and connectivity. The waterways, riparian zones and surrounding woodland all serve as important corridors, particularly for the Bechstein's bat;
- The draft EIA states that '*effects on watercourses are considered to be limited*'. But in their response to the EIA, HDC's Ecology Officer wrote: '*It is welcomed that the maintenance of the integrity of the site's existing wetland habitats, including Ifield Brook and River Mole and pond habitats where possible, have been regarded within the potential mitigation measures. However, further in-depth consideration and mitigation measures will be needed with respect to the construction of the bridge over the River Mole (para 3.1.3), as this has potential to alter the ecological function and have knock-on effects.*' And the Environment Agency (EA) noted '*a significant lack of consideration with regard to the aquatic environment, predominantly invertebrates, fish and supporting habitat*' (7.2.1).
- The development will inevitably have a significant effect on the watercourses within the site and on the Mole downstream:
  - Changes to the river and wetland dynamics caused by the use of SUDs,
  - The increased pressure on local waste water treatment works (WWTW) of 3,000 houses, given the current problems with sewage outflows into the Mole, and
  - The pollution from an additional 4,000+ cars using roads, across the River Mole. Research shows that rivers next to roads are contaminated by large particles from tyres and chemicals from engine fluids.

d) that other ponds, watercourses, wetlands, ecologically important hedgerows and woodlands and veteran trees are in the first instance **recorded**, protected and enhanced in situ, or else impacts appropriately mitigated to ensure the protection of protected or vulnerable species.

This policy requirement is incompatible with the West of Ifield proposals and will be impossible to implement because the proposal for a road (MMTC) crossing the river Mole through the centre of the Linear Park will cut through wildlife corridors – not least the River Mole – and the development overall will damage the network of trees and hedgerows connecting the River Mole corridor to the surrounding habitats.

Having said that strengthening of the policy is needed because:

- There is no indication that HDC has undertaken any survey work of the important hedgerows to record what exists on the WOI site. Records of local naturalists (authors) show that there are important hedgerows and habitats that have not been recorded and will be destroyed by development. We have specific concerns about the hedgerows where the MMTC will cross the River Mole (TQ241377) and have recorded these in detail. Similarly the hedgerow which links the River Mole to the Ifield Wood area (TQ241378). These hedgerows have been in place since the 1850s according to OS maps. See Sup Doc A;
- The policy should require that veteran and notable trees and hedgerows are identified, and trees that meet the criteria for a Tree Protection Order should be designated. There are veteran tree candidates in the centre of the proposed development;
- Where known priority species exist and have been recorded these need to be clearly identified and named in the Local Plan Evidence Base with their locations and habitats specifically designated for protection and a local habitat management plan produced for these species, again in the Evidence Base. Examples include the hedgerows which are flightlines for the Bechstein's bats and those used for egg-laying by Brown Hairstreak Butterflies. Two ponds with recorded population of Great Crested Newts are shown to be replaced with buildings near TQ237372 (opposite Old Pound Cottage).

Given it is impossible to protect all these features and at the same time deliver the WOI proposals, and that on-site mitigation is not possible to the extent required, we presume that HDC is accepting and planning for off-site BNG.

*e) ensure the retention and creation of wildlife corridors, and support delivery of the emerging Nature Recovery Network*

This policy is incompatible with the West of Ifield proposals and will be impossible to implement because the new road (MMTC) will remove all east/west wildlife corridors from Ifield Brook Meadows, will cut through several ancient hedgerows and through the river Mole corridor.

There is no evidence that any new wildlife corridors are proposed by HDC or Homes England.

Given 75% of the site has been identified as BOA the plan should not proceed until a detailed evaluation of existing and potential networks in the area West of Ifield and the importance of their connectivity and relationship to the wider Horsham and Mole Valley networks is established. They must be properly understood with a view to designation and long-term protection;

There is no evidence of any engagement with Mole Valley DC, Crawley BC or with the Gatwick Greenspace Partnership in respect of protecting and enhancing the wildlife corridors to Ifield Brook Meadows LWS, and those running north along the River Mole through Rusper parish into Surrey.

*f) the proposals do not have an adverse impact on operations at Gatwick Area through increased risk of bird strike, create building-induced turbulence or lighting that could pose a hazard to the safe operation of the airport aerodrome*

This policy is incompatible with the West of Ifield proposals because the river Mole frequently floods at the northern end of the site which attracts wintering birds, and the provision of a country park with SUDS and wetland in the same area has the potential to attract additional flocks. Bird records from this part of the site can be provided.

*g) Necessary mitigation measures are included in the site design to mitigate impacts on protected species, including Bechstein's bats.*

The policy is not specific enough. Although the mention of Bechstein's bats is welcome, other protected species and habitats should be listed in the Plan document, and it should be made clear that developers are required to deliver management plans for these habitats and species.



In response to the 2023 EIA Scoping Request the Horsham ecologist raised the possibility that the site could be considered for designation as an SAC and the Plan should not be approved until this possibility has been evaluated. See Sup Doc B – Bechstein’s bats.

### 3. Evidence Base

The following reports from the HDC Local Plan evidence base<sup>4</sup> are considered in relation to Strategic Policy HA2:

- a. Strategic Site Assessment, December 2023<sup>5</sup>
- b. Horsham Biodiversity Net Gain Assessment<sup>6</sup>
- c. Sustainability Appraisal<sup>7</sup>, December 2023
- d. Green Infrastructure Strategy and Guide<sup>8</sup>, 2024
- e. Habitats Regulations Assessment

Homes England’s EIA Scoping Opinion Request Report<sup>9</sup> 2023 is also considered, although not included in HDC’s Evidence Base.

#### a. Strategic Site Assessment

The biodiversity summary for West of Ifield (SA 101, page 90) recognises that the site has high biodiversity potential and gives a summary of the biodiversity and habitats present. The allocation of the site is assessed as Unfavourable in terms of biodiversity even with the HA2 policies and protections in the Plan:

*‘Given some of the uncertainties around the delivery of biodiversity net gain, the presence of Bechstein bats, and the uplift of biodiversity net gain that can be achieved an unfavourable rating is concluded.’*

**There are, however, errors and omissions in the description, and strong arguments for reassessing SA101 as Very unfavourable for biodiversity.**

- The Site assessment understates the biodiversity value and potential of SA101. Although Ifield Brook Meadows LWS is described, there is little mention of the other designated wildlife-rich assets adjacent or in very close proximity (Map A). The site is bordered by Hyde Hill LWS (ancient woodland), within 330m of Willoughby Fields Local Nature Reserve, and within 650m of House Copse SSSI;
- Bechstein’s bat roosts are mentioned as being *‘close to the proposed development’* whereas roosts are recorded right at the centre of the site where the housing would be densest, and immediately on the perimeter of the golf course also an area of dense housing;
- The impact on Ifield Brook Meadows is not acknowledged – the fact that all connectivity to the countryside will be severed and the LWS will be criss-crossed by cyclepaths and footpaths to provide access to Ifield station and shops. Given the resulting habitat isolation, and massively increased footfall, it’s hard to see how the aspiration on page 92 could ever be realised *‘Particular mitigations identified include protecting and enhancing Ifield Brook Meadows’*;
- Around 75% of the site is designated as BOA, but this is not acknowledged. See Map B in the Annex;
- There is no evidence that the assessment has been informed by thorough fieldwork surveys and evaluation of the habitats present. Important findings have been presented in the EIA, based on Homes England’s surveying work, e.g. *‘The invertebrate assemblage in total is considered to be of regional significance’*. These survey results are not available publicly, and there is no evidence to suggest they have been shared with HDC;

<sup>4</sup> <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>

<sup>5</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf)  
<sup>6</sup> [Horsham-BNG-Assessment.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf)

<sup>7</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf)

<sup>8</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0013/132610/24-01-19-GI-Strategy\\_ALL-Final\\_rdcd.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0013/132610/24-01-19-GI-Strategy_ALL-Final_rdcd.pdf)

<sup>9</sup> [https://iawpa.horsham.gov.uk/PublicAccess\\_LIVE/Document/ViewDocument?id=BD51AD1C81CE422DAE30FF2E5F17624F](https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=BD51AD1C81CE422DAE30FF2E5F17624F)

- Similarly, there is no evidence that the Site Assessment is informed by anything other than a desk-top review of the data in the SxBRC. And no evidence of consultation with wildlife organisations, or the Gatwick Greenspace Partnership;
- The assessment virtually acknowledges that provision of BNG on-site will not be possible: *‘The site promoter has committed to providing biodiversity net gain but further information is required to understand how this will be achieved, particularly as there are a number of parcels of land in this area that are already designated for their wildlife importance. The proximity of some of the land to Gatwick Airport may also limit the type of enhancements that can be achieved to avoid any increased risk from bird strike at the airport.’* Presumably these ‘parcels of land’ are the LWSs and LNR immediately adjacent to the site, so why not acknowledge them properly? and
- If on-site BNG cannot be delivered, then the proposal is for off-site BNG credits, and this is taken into account in the Viability assessment, although not mentioned in the Site Assessment. The BNG Assessment<sup>10</sup> in the HDC Evidence Base concludes that BNG +12% is not possible without significant off-site allocation and/or considerable cost. However, given the current lack of survey data and understanding of the biodiversity of the site and surrounds, there may well be a greater deficit than is currently factored into the Viability assessment, which would need to be addressed.

### **b. The BNG Assessment**<sup>11</sup>

The BNG Assessment states (3.13) that BNG+12% would be reasonable aim on most sites, but is not achievable for WO1. WO1 is assessed as currently having the lowest potential for BNG, of the three strategic sites allocated, with a maximum potential of +7.29% BNG achievable. See Table 3 (pages 17-18).

In order to satisfy the requirement for BNG+12%, off-site BNG units will need to be purchased and Temple Group estimate the cost to be around £1million. Alternatively, the size of the development could be reduced by 7.57ha to achieve the required BNG (paragraph 4.6).

We would argue, based on the evidence provided elsewhere in this report and in our EIA response, that existing biodiversity is higher than that calculated using the Natural England Biodiversity Net Gain metric v3.1. which is a desk-based approach without local survey input. And that the biodiversity loss is likely to be greater than assumed by Temple Group.

It would be especially worrying if HDC were using these BNG metric calculations as a significant part of their overall assessment of the WO1 site. These BNG metrics are the result of a desk-based exercise. What is needed is a thorough understanding of the habitats and species on site, obtained via a series of on-site surveys throughout the year. This is the only way to obtain a comprehensive and accurate record and baseline for this site.

### **c. Sustainability Appraisal**<sup>12</sup>, July 2021

We make detailed comments about the SA in our response to Policy 17, but present here a few general points about the SA process overall, followed by comments on the scoring of HA2.

**One of our fundamental concerns is that HDC’s decision-making is not supported by adequate information or understanding. Given the importance of the SA in the selection of sites for allocation in the Plan, and the fact that it’s a data-based exercise – scoring sites and policies against criteria – then a lack of adequate data must cast significant doubt on any conclusions. This is a big problem for the plan-making, and is further evidence that the allocation of the West of Ifield is likely to be unsound.**

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<sup>10</sup> Temple Group, January 2023 [https://www.horsham.gov.uk/data/assets/pdf\\_file/0016/121705/Horsham-BNG-Assessment.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0016/121705/Horsham-BNG-Assessment.pdf)

<sup>11</sup> Temple Group, January 2023 [https://www.horsham.gov.uk/data/assets/pdf\\_file/0016/121705/Horsham-BNG-Assessment.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0016/121705/Horsham-BNG-Assessment.pdf)

<sup>12</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf)

- At Regulation 18 stage Sussex Wildlife Trust provided a number of strongly negative comments (/6192<sup>13</sup>), in relation to assessment across all sites, concluding that *'the plan should not be taken forward as the significant effects on biodiversity remain unquantified and poorly understood. Whilst any level of development has the potential to negatively impact on biodiversity, SWT believes that the conclusions of the SA are heavily influenced by the generalised nature of the assessment. Argues that the lack of sufficient up to date information on the District's ecological assets and particularly the wider networks exacerbates this issue'*. HDC's response was to defend and not revise the approach taken, except to include the findings of the Habitats Regulations Assessment; and
- The generally positive judgements in the SA regarding HDC's biodiversity policies seem to be based on a presumption of a strong strategy and set of policies for protecting and enhancing habitat, biodiversity and ecological networks. But the Local Plan and Evidence Base documents don't provide this. See our submission on Policy 17 for discussion of how the Plan does not provide meaningful policies to protect and enhance biodiversity.

**In terms of the scoring of sites, it's not clear why the requirements in HA2 are assumed to be so much more effective in terms of mitigation than the requirements for other sites.**

- In the **2021 SA** the effect of WOI on Biodiversity was assessed as *Significant negative effects likely*, ie the worst score, as was the case for the majority of sites. There was little discrimination between the sites – presumably due to the lack of data;
- All sites were also scored *'considering the mitigation in Policies HA1 and HAx'*. And most sites were then upgraded by one step, to *Mixed significant negative and minor positive*. In the case of the West of Ifield, however, the score was upgraded by three steps to *Mixed uncertain significant positive and significant negative effect*. In other words the positive and negative effects are expected to 'net out' in the scoring; and
- The explanation in the 2021 SA – paragraph 8.314 is: *'Overall, considering the requirements of these policies, which include the delivery of a new park within which biodiversity is to be protected, a Mixed uncertain significant positive and significant negative effect is now expected in relation to SA objective 6: biodiversity and geodiversity'*. So it is assumed that the existence of HDC's list of policy requirements, and HE's proposal for a linear park have shifted the score from the worst, to neutral. These assessments for West of Ifield are unchanged in the **2023 SA** – Table 7.1.

**We discuss elsewhere why HDC's policy requirements and HE's linear park are not likely to effectively mitigate, protect or enhance biodiversity.** But to highlight a couple of points:

- The assumption that sufficient BNG can be achieved on-site appears to contradict the findings in the BNG Assessment;
- The recent discovery of Bechstein's bat roosts on and around the site (made public in May 2023) must affect the scoring, irrespective of HDC now including a specific requirement at 4.g. in Policy HA2;
- The linear park is highly unlikely to mitigate for the damage caused by a road (MMTC) crossing the River Mole and cutting through ancient hedgerows;
- The risks to Ifield Brook Meadows cannot be adequately mitigated. It's position, to be surrounded by housing, and forming the main non-car route from the development to Ifield station and shops will be catastrophic for its biodiversity;
- The SA 2021 statement *'The development of the site still has some potential to have adverse impacts on local wildlife site and ancient woodland within the site as a result of habitat disturbance and/or the effects of noise/air/light pollution associated with the development'* makes clear the lack of understanding of the site and the assets around it, and running through it; and

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<sup>13</sup> [Final-SA-Report-for-Horsham-District-Local-Plan-Reg-19-Appendices-document.pdf](#)

- The lack of evidence for HDC or HE consulting wildlife groups, or cooperating with neighbouring authorities on biodiversity, does not inspire confidence that the requirements or mitigations will be implemented positively or effectively. HA2 needs to be stronger and to require this cooperation.

#### **d. Green Infrastructure Strategy / Study<sup>14</sup>, 2024**

**Although HDC’s Green Infrastructure Strategy has recently been updated it is still undeveloped, and based on an inadequate underlying review of assets.** We address this in detail in our response to Policy 17, but the following points are relevant to Policy HA2 because they support our concern that HDC’s decision-making is not supported by adequate information or understanding. In particular there is a lack of understanding of Rusper parish to the extent that misconceptions about a lack of biodiversity, proximity to Gatwick and Crawley, etc. are affecting plan-making.

The lists of assets and opportunities in Appendix 1 are short and high level and the methodology for identifying them is inadequate. Section 6 of the 2014 version of the document made clear that a desktop exercise was carried out in 2014, and the lists appear not to have changed since. This is insufficient. Such a review should also involve consultation with local groups and communities.

**The lists of assets for North, Mid and South of the District (Appendix 1) are superficial and unbalanced, and the assets and opportunities in Rusper are downplayed.** The list for the North of District (A2) acknowledges that ‘*The northern area of Horsham District has a particularly strong provision of green infrastructure*’ and goes on to list High Weald AONB, Chesworth Farm, Rookwood, and Warnham Nature Reserve. But there is no specific mention of any biodiversity in Rusper parish; non-specific mentions of ‘a number of SSSIs’ and BOAs do apply to Rusper but this is not made clear.

This lack of balance is also a concern if these maps are used to guide the provision of compensatory habitat when BNG is required, ie the inaccurate maps and assessments could lead to off-site BNG habitat being allocated away from the north of the District.

In order to balance the lists, the following additions and removals should be made to the North of District bullet point list (A.2.3):

- **The upper reaches of the river Mole in the north provide an important resource for flood attenuation, biodiversity and recreation.**
  - Why? In line with the same point made about the Arun and Adur in North, Mid and South lists.
- **A number of Biodiversity Opportunity Areas (BOAs) adjoining east and south and just north of Horsham including St Leonards Forest, Rusper Ridge, Chesworth Farm and Ifield Brook.**
  - Why? Given the prevalence and variety of BOAs in the North, and the fact that they’re all heavily used for recreation by the residents of Horsham and Crawley.
- **St Leonards Forest, Ifield Wood and Meadows, and Kilnwood Lane are all important sites for local residents and biodiversity.**
  - Why? The relatively high population density due to the towns of Horsham and Crawley makes these areas even more important, and the footpaths are highly valued for recreation. In fact Ifield Meadows and Kilnwood Lane are Crawley’s only remaining rural fringe and should be protected in the same way that Chesworth Farm is protected for Horsham residents.
  - In line with the points in South (A.2.12): *Sullington Warren, Monkmead Woods, Heath Common and Washington Common are all important sites for local residents and biodiversity.*

Although there is mention of HDC working with neighbouring authorities to develop and implement this Strategy, no specific activities are given or authorities named – not Crawley, Mid-Sussex or Mole Valley. Cross-boundary working appears to be a future aspiration only. The failure to work with Crawley BC and Mole Valley DC is a major omission, given the location of the WOI site, and is discussed elsewhere in this submission.

<sup>14</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0017/104246/Green-Infrastructure-Study.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0017/104246/Green-Infrastructure-Study.pdf)

## **e. Habitats Regulations Assessment**

**The Plan should not be approved until the possibility for SAC status has been evaluated.** Although presumably the landowner – Homes England – would be unlikely to agree to this designation.

The scope of the Habitats Regulations Assessment is restricted to Special Protection Areas, Special Areas of Conservation and RAMSARs, so in Horsham District only covers Arun Valley Ramsar Site, SPA and SAC, Ebernoe Common SAC, The Mens SAC, and Ashdown Forest SAC. Risks to these areas only are considered.

For Ebernoe Common and The Mens the ‘qualifying species’ for SAC status are Barbastelle and Bechstein’s bats, which favour ancient woodland. Since the Homes England’s recent surveys have identified both of these species roosting and feeding across and around the West of Ifield proposed development site, is there a case for the area to be considered for SAC status. The Horsham ecologist’s response to the 2023 EIA makes this point:

*‘Please note, that this site has potential to meet published selection criteria for SAC designation if there is sufficient evidence to support that the Bechstein’s bat maternity roosts in this area and the surrounding area are of, or could be restored to, favourable conservation status. This is something that the Applicant will need to consider. As per CIEEM ECIA guidelines, this may require future discussions relating to the assessment of importance and how the site should be treated.’*

National bat expert Martyn Cooke<sup>15</sup> advises:

*‘When considering its Local Plan, Horsham DC must consider the presence, and importance, of the Bechstein’s colony in the area shown above [north of the District and upper Mole Valley]. Large scale development should not be permitted and for small scale developments safeguarding measures should be implemented to ensure compliance with Annex II species legislation, such as minimal lighting etc.*

*It should be pointed out that if the letter of the European Habitats Regulations were followed, Natural England should designate the area as an SAC.’*

See Sup Doc B for Martyn’s full report on the significance of the bat roosts and colonies around the WOI site.

## **f. EIA Scoping Opinion Request Report, 2023**

Although not part of HDC’s Evidence Base the EIA Scoping Request Report provides a useful insight into Homes England’s understanding of, and intentions for, the sites and its surroundings. We submitted detailed comments on the Report, to HDC, which can be seen in Sup Doc C. In summary, our main concerns with the EIA process are:

- In general, the way the assessment is described doesn’t inspire confidence that it is being conducted in line with the CIEEM Guidelines. It appears to be confused and vague, and there must be concern that it will not adequately evaluate ecological features for the baseline.
- Data used in the initial baseline exercise are woefully out of date, and limited. There appears to have been no consultation with local Wildlife Trusts or the Gatwick Greenspace Partnership.
- Nowhere in the EIA is there an explanation of how the ecological value of designated sites (and other features) has been or will be assessed. Designated sites are described, but without any mention of surveying. Justifications for scoping sites in or out for future study are based on distance from the site, not the presence or absence of ecological features.
- The EIA should be clear that in order to compile an adequate baseline, more surveys are needed covering specific areas surrounding the development site, as well as targeted-species surveys. According to Natural England: ‘*The area likely to be affected by the development should be thoroughly surveyed*’ (in their response to the scoping

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<sup>15</sup> Martyn Cooke is a Natural England licenced bat worker holding both Class 3 and Class 4 bat licences. Since 2012 he has organised the Mole Valley Bat Project which mainly focuses on the local Bechstein’s bat population. He is a member of the UK Bechstein’s Bat Study Group and the Mole Valley DC Conservation Group. He is also an active member of both Surrey and Sussex Bat Groups.

request). The EIA doesn't provide evidence that any surveying has been done outside the development site itself. If this is the case then as a priority the following should be surveyed: Willoughby Fields LNR, the Ifield Brook Meadows LWS, Hyde Hill Woods LWS and the Ifield Wood ancient and priority woodland.

- Only 3 (or possibly 4) designated sites have so far been 'scoped in', despite the fact that there are 13 within 2km of the development site. Most of these should be scoped in and surveyed. There should be no question about the sites immediately adjacent to the site, and Ifield Brook Meadows, Hyde Hill Woods should be scoped in and surveyed as a top priority.
- House Copse SSSI is 'scoped in' but its importance as an SSSI is underplayed (para 7.4.5). The description of House Copse should give a true impression of its rarity and national importance.
- All the local woodland and copses with known roosts of Bechstein's bats should be scoped in, ie Glover's Wood, Hyde Hill Woods, Ifield Wood west, and The Mount (maternity roost with 57 bats, at 1km from the site). Glover's Wood SSSI is scoped out '*due to [its] distance from the Site (more than 1.7km)*' (para 7.4.5). But paras 7.3.4 – 5 explains that the study area comprises 2km beyond the site boundary, and 5km for bats, so a distance of 1.7km cannot be a reason for scoping out. Willoughby Fields should be surveyed and assessed for impacts on bats, as it is an LNR.
- The only things identified in the 2km and 5km zones are designated sites, but the EIA should clearly describe the extent and position of all the undesignated but priority habitat within the study area, and within and adjacent to the site. This includes ancient woodland, hedgerows and shaws, and all other priority woodland. Ifield Wood should be scoped in.
- The habitats and species associated with the River Mole and Ifield Brook are not acknowledged sufficiently in the EIA. They should be subject to separate detailed assessment and discussed in a dedicated section of the EIA.
- The EIA should also describe how the hedgerows and shaws across the study area been assessed. It cannot be correct that the number of important hedgerows which have been identified decreased between the 2020 and 2023 draft EIAs, from five to the current figure of three (7.4.5). Hedgerows surveys by local naturalists suggest that the area has many more important hedgerows than is being suggested in either the 2020 or 2023 EIA drafts.
- Rusper Ridge Biodiversity Opportunity Area (BOA) has been omitted from maps and text – this should be corrected, and the impacts of the development on achieving its targets should be scoped in. Neither the 2020 or 2023 EIA drafts acknowledge the fact that that Ifield Golf Course falls entirely within the Rusper Ridge BOA, as does most of the future 10,000 site. See Map B.
- The draft EIA appears to be downplaying the significant presence of Bechstein's bat colonies within and around the site. While bats are scoped in, the text should accurately indicate the rarity, status and distribution of this species across the study area (5km for bats), and hence the value of the populations on and around the site, the value of their habitat and the impact of the development.
- Properly up to date extracts from the SxBRC and SBIC should be assessed and form part of the baseline – the list of the baseline data shows that they range from 2007 to 2018. The reports and survey results of the Gatwick Greenspace Partnership should be reviewed.
- It's not clear that Homes England has consulted with any non-statutory stakeholders such as Sussex and Surrey Wildlife Trusts, local naturalists, and the Gatwick Greenspace Partnership. This is contrary to CIEEM Guidelines.

## Glossary

BNG	Biodiversity Net Gain
BOA	Biodiversity Opportunity Area
CBC	Crawley Borough Council
EIA	Environmental Impact Assessment
HDC	Horsham District Council
HE	Homes England
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MMTC	Multi-modal Transport Corridor
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SBIC	Surrey Biodiversity Information Centre
SSA	Strategic Site Assessment
SSSI	Site of Special Scientific Interest
SWT	Sussex Wildlife Trust (also Surrey Wildlife Trust)
SxBRC	Sussex Biodiversity Records Centre

## Annex

Map A – West of Ifield 3,000 and 10,000 sites with designated sites and priority habitat.

Map B – Horsham Nature Recovery Network – highlighting that 75% of the West of Ifield sites are Biodiversity Opportunity Areas.

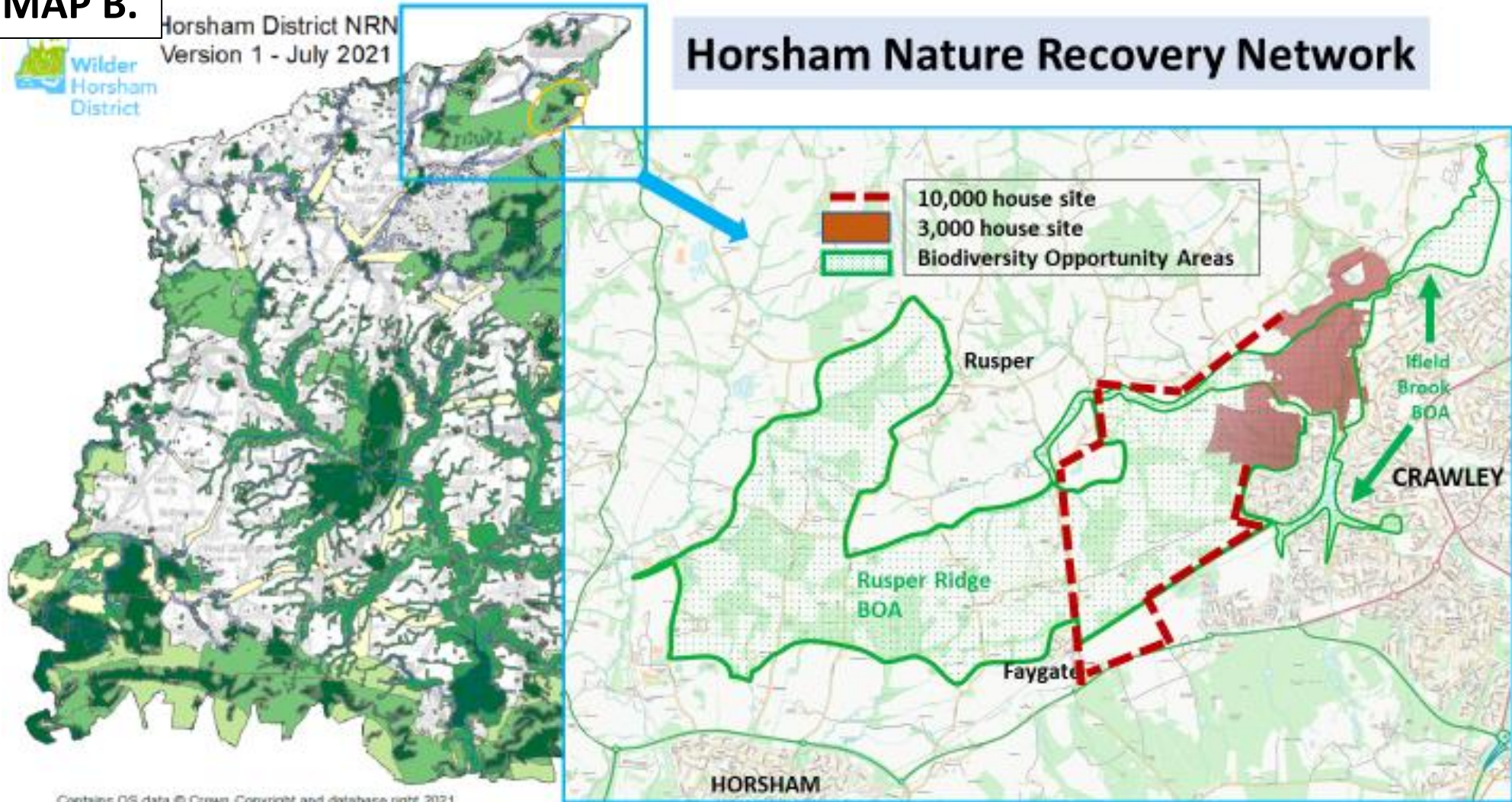




**MAP B.**

Horsham District NRN  
Version 1 - July 2021

**Horsham Nature Recovery Network**



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Watercourses	High habitat potential
Core sites with high nature value	Buffer zones for core sites
Very high habitat potential	Potential corridors and stepping stones

**75% of the West of Ifield is Biodiversity Opportunity Area**  
= High habitat potential  
NB House Copse SSSI and Hyde Hill LWS = Core sites with high nature value

# Save West of Ifield Regulation 19 Response<sup>16</sup> - Supplementary Document A

## Policy HA2 and the Allocation of Land West of Ifield

### Biodiversity - Priority species and habitats

#### Introduction

The main reason for putting this report together is to challenge the rather low opinion that HDC seems to have of the habitat and biodiversity in Rusper parish. Their *Site Assessment* understates the biodiversity value and potential of the West of Ifield site – Ifield Brook Meadows Local Wildlife Site (LWS) is described, there is little mention of the other designated wildlife-rich assets adjacent or in very close proximity. Similarly, the *Green Infrastructure Strategy* downplays the assets and opportunities in Rusper. And nothing in the Plan or its Evidence Base mentions that much of the Upper Mole Valley is in Rusper parish, and that the river, hedgerows and woodland are vital wildlife corridors up into Surrey. There appears to be no collaboration with Mole Valley District Council, or reference to the great work being done by the Gatwick Greenspace Partnership.

So the aim is to paint a picture of the habitat and biodiversity that currently exists across and around the West of Ifield site, insofar as it has been recorded and is known to local naturalists. The protected species recorded so far are reviewed, followed by a review of the main areas of ecological interest roughly in order of distance from the 3,000 house site.

**The site and its immediate surroundings** are comprised of a mosaic of habitats of the Low Weald – Mole Valley – and are typically rich in wildlife. As shown in Map 2 (at end of this document) the 3,000 house site is almost surrounded by Local Wildlife Sites, ancient and priority woodland. There is over 30 ha of ‘ancient woodland’ on the site or immediately adjacent to it, plus another 30 ha of ‘priority woodland’ – both designated by Defra. That’s why 75% of the site is identified as Biodiversity Opportunity Area.

Map 2 also shows the designated sites which are in close proximity but not bordering the site, and would also be impacted. These include Ifield Mill Pond LWS, Willoughby Fields Local Nature Reserve (LNR) and House Copse Site of Special Scientific Interest (SSSI). There are also many non-designated but wildlife-rich assets adjacent to or in very close proximity to the site, and since Ifield Wood is a good example it is covered in this report.

The site itself consists of a golf course and arable, pasture and parkland, crossed by the River Mole and Ifield Brook – it forms an important part of the Upper Mole Valley. The whole area is rich Low Weald habitat with many copses and shaws of mature Oak, Ash and Hornbeam, and thick hedgerows with many ancient woodland indicator species. But much better to let two local experts describe the area:

*‘The heavy Wealden clay covering most of our area is not favourable for large scale arable agriculture therefore field sizes have remained small. Ancient Hedgerows and mature hedgerow trees, particularly Oaks have remained intact and the area contains numerous small copses which are all well connected. Large amounts of ancient/semi-ancient woodland also survive as do small field ponds. This mosaic of landscape features is crucial for the Bechstein’s to survive and prosper.’* Martyn Cooke – Surrey Bat Group

*‘The small fields between House Copse and Hyde Hill Wood [are remainders of] the lovely landscape pattern - typical Wealden landscape of small copses and fields with ancient hedgerows between. So much of this medieval landscape has gone now, and it is awful to think of this bit now being destroyed. The whole area should really become a country park, a green lung for the ever-expanding Crawley and Horsham.’* Frances Abraham – Sussex Botanical Recording Society

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<sup>16</sup> This document has been prepared on behalf of the Save West of Ifield residents’ group by Peter Townend and Fenella Maitland-Smith.

The **Sussex Biodiversity Records Centre (SxBRC)** database hold records of the flora and fauna of Sussex and have a significant number of records for the West of Ifield area. This should not be taken as the sum of biodiversity of the West of Ifield however – far from it. As acknowledged by Sussex Wildlife Trust in their Regulation 2018 response, Horsham District’s habitat and biodiversity is under-recorded. And it’s clear from examining the SxBRC records that there are none for large parts of the West of Ifield despite the suitable habitat. It is therefore important to remember, as SxBRC state in their reports:

- *“a lack of records for a species in a defined geographical area does not necessarily mean that the species does not occur there – the area may simply not have been surveyed”*

New species records are continually being added and there is a substantial amount of data held by local naturalists collected over many years that is not included in the SxBRC data.

Unfortunately there is no evidence of any surveying by HDC, or any attempt whatsoever to understand the key habitats and breeding locations on or around the West of Ifield site. Similarly, no detailed species records from surveys by Homes England have made public, and permission was repeatedly refused for us to do any surveying on the site. There is a concern that the Homes England Environmental Impact Assessment (EIA) will not be based on an adequate survey base, and neither will the Biodiversity Net Gain (BNG) assessments and monitoring be using a robust baseline. The area should be fully evaluated both as the baseline for BNG, but also so that suitable mitigation can be put in place should the development go ahead. See Save West of Ifield’s responses to the 2023 EIA Scoping Request – Supporting document C in this submission.

On the other hand, as a result of Homes England’s recent surveying, ecologists have discovered colonies of rare and highly protected Bechstein’s bats on and around the site. Homes England have also stated that *‘the invertebrate assemblage as a whole is considered to be of regional importance’*. This is solid evidence that proper surveying can reveal the richness of this area, which HDC otherwise seem to downplay. Similarly, evidence from the SxBRC, Surrey Biodiversity Information Centre and the Gatwick Greenspace Partnership reports<sup>17</sup> shows that where more surveying and recording has been carried out the area has a high incidence of priority species which will be impacted by development.

## Protected Species

We are grateful to the Sussex Biodiversity Records Centre (SxBRC) for providing us with records relating to the Ruspur Ridge and Ifield Brook BOAs showing a large number of records of protected and priority species and habitats with many individual records. The SxBRC descriptions of designated sites tell us that all these sites around the West of Ifield site have recorded a variety of Biodiversity Action Plan priority species.

It is important to note that many local wildlife enthusiasts have also amassed extensive records but have not submitted them to the SxBRC. We have however had access to many of these records and they show a biodiversity profile important as any other in Horsham district.

It should also be noted that the West of Ifield area also has a large number of *Sussex Rare* species listed in the SxBRC data.

The following species have been selected from the many protected species that are present West of Ifield to illustrate the biodiversity that exists. The importance of these species and the impact of development in relation to them is discussed.

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<sup>17</sup> <https://www.gatwickairport.com/company/sustainability/biodiversity.html>

**Please note that the focus here is on species recorded on the West of Ifield 3,000 house site itself, not the adjacent LWSs, although some references are made to the surrounding area.**

- Bechstein's bat
- Great Crested Newt and other protected amphibia / reptiles
- Brown Hairstreak butterfly and other protected insects
- Birds.

### **Bechstein's Bat**

See Supporting document B for full details – the following is a summary. Bechstein's bats are uncommon throughout their range and have been classified as 'Near Threatened' and their population 'Decreasing' on the IUCN Red list. They are listed on Annex II of the European Habitats Directive, which gives them enhanced protection and they are a UK Biodiversity Priority Species (JNCC 2007). If the letter of the European Habitats Regulations were followed, Natural England should designate the area as a Special Area of Conservation (SAC).

Between June and Sept 2021 88 records were submitted to the SxBRC for Bechstein's bats, including across and immediately adjacent to the West of Ifield site. Some of these records are for roosts of 20+ individuals, so the number of individuals is much higher than 88. These records are particularly exciting because many of the roosts were not previously known to local experts and so not recorded. And because some of the new roosts are large maternity roosts, which is very important for understanding the local demographics of the population.

The records can be summarised as follows:

- A roost of at least 20 bats at the heart of the site of 3,000 house site.
- Two maternity roosts in Ifield Wood – of 23 and 6 bats – immediately adjacent to the site.
- An unspecified roost in Hyde Hill Woods immediately adjacent to Ifield Golf Course. Unfortunately the size and type of roost is not specified. Plus 40 records of individuals detected on the West of Ifield site including the golf course, probably feeding.
- Another maternity roost of 57 bats on The Mount - less than a mile from the site. And another maternity roost of 23 in Lambs Green – 1.5 miles from the site.

Radio-tracking has revealed that these roosts are part of one very large colony which extends from the north of Rusper village to the north of Charlwood and eastwards to Ifield and the A264. To date over 15 tree roosts have been located including at least five maternity roosts. From emergence counts there are over 200 individual bats, possibly more, within the colony.

**This makes the colony one, if not the biggest colony found within the UK and is of National and potentially International importance. The area should be considered for designation as an SAC.**

### **Great Crested Newt and other protected amphibia / reptiles**

*"Due to enormous declines in range and abundance in the last century, the great crested newt is strictly protected by British and European law which makes it an offence to: kill, injure, capture or disturb them; damage or destroy their habitat; and to possess, sell or trade. This law refers to all great crested newt life stages, including eggs" <sup>18</sup>*

Great crested newts are distributed across the West of Ifield site, as evidenced by records in SxBRC<sup>19</sup> reports. The Homes England's 2023 EIA Scoping Request reflects this: 'GCN surveys undertaken in 2018 to 2022 identified the presence of three GCN metapopulations, with a 'medium' size population associated with the golf course in the south of the Site.' And the 2020 EIA Scoping Request also shows the locations of some of these records (Appendix 7.1).

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<sup>18</sup> <https://www.arc-trust.org/great-crested-newt>

<sup>19</sup> Sussex Biodiversity Record Centre <https://sxbrc.org.uk/home/>

Examination of the initial Homes England proposals masterplan indicates that the ponds and surrounding habitat are directly and significantly impacted by the proposed development, particularly in the case of the golf course which will be covered with housing and a secondary school.

The Naturespace Partnerships assessment used as part of the District Level Licencing scheme<sup>20</sup> which HDC have obtained from Natural England shows that West of Ifield has been classified as Red Impact Zone “*highly suitable habitat being the most important area for Great crested newts (and therefore with the highest potential impact)*”. Given HDC has chosen to allocate the West of Ifield site it’s not clear what the District Level Licencing means in terms of protecting the Great Crested Newts or their habitats. But is clear that the population West of Ifield is highly threatened.

Presumably plans for the protection of the Great Crested Newts West of Ifield site will come forward as part of any planning application, but in situ preservation of the species is unlikely and the likely outcome will be mitigation and off-site habitat creation elsewhere.

Other important and legally protected Amphibians and Reptile species which can be found on the West of Ifield site and will be threatened by any development include Smooth Newt, Grass Snake, Slow Worm and Common Toad. The Common toad has “*been declining, especially in the southern half of Britain*”<sup>21</sup>.

### **Brown Hairstreak butterfly and other protected insects**

The West of Ifield area is important for butterfly species, and one species is especially vulnerable to the proposed development – the Brown Hairstreak. There are numerous records of this species on and around the site and neighbouring Local Wildlife Site, Ifield Brook Meadows.

The Brown Hairstreak is a protected species under UK law and the following summary from Butterfly Conservation<sup>22</sup> states:

*“It is locally distributed in southern Britain and mid-west Ireland and has undergone a substantial decline due to hedgerow removal and annual flailing, which removes eggs.*

#### *Conservation status*

- *Section 41 species of principal importance under the NERC Act in England*
- *Section 7 species of principle importance under the Environment (Wales) Act 2016*
- *UK BAP status: Priority Species<sup>23</sup>*
- *Butterfly Conservation priority: High“*

The Brown Hairstreak has a specific habitat requirement i.e. it is dependent upon a particular host plant, Blackthorn, for its lifecycle. Hedgerows containing Blackthorn are common West of Ifield and they criss-cross the site and surrounds. Sympathetic management of these hedgerows is important for the continued sustainability of the local population. Hedgerow flailing and cutting back hard and removal is already a widespread practice by the existing landowners including HE. A move to a more sustainable hedgerow management regime such as that recommended by Butterfly Conservation<sup>24</sup> would be appropriate. However, there is no evidence that this approach has been considered and indeed the removal of hedgerows as part of any development would threaten the sustainability of the Brown Hairstreak population West of Ifield.

Other notable butterfly species can be found in and around the Hyde Hill Woods LWS, which supports a large number of species including uncommon or localised UK BAP priority species such as Dingy Skipper, White Admiral and Small Heath. These species also need specific habitats and it is important to identify and manage these habitats to ensure

<sup>20</sup> <https://www.horsham.gov.uk/planning/great-crested-newt-district-licensing-scheme> and <https://naturespaceuk.com/>

<sup>21</sup> <https://www.arc-trust.org/common-toad>

<sup>22</sup> <https://butterfly-conservation.org/butterflies/brown-hairstreak>

<sup>23</sup> UK Biodiversity Action Plan <https://jncc.gov.uk/our-work/uk-bap/>

<sup>24</sup> <https://butterfly-conservation.org/sites/default/files/habitat-hedgerows-for-hairstreaks.pdf>

the local populations are sustained. Protection of the White Admiral population should be given particular consideration given “*population monitoring has shown a dramatic decline in the last 20 years*”.<sup>25</sup>

More generally, Homes England’s 2023 EIA Scoping Request notes in paragraph 7.4.5 that ‘The invertebrate assemblage as a whole is considered to be of regional importance’:

*‘Targeted surveys for terrestrial invertebrates were undertaken in 2018, 2019 and 2023 covering the habitats identified as being potentially suitable for notable invertebrates in the scoping surveys.*

*During 2018 and 2019 surveys, 719 species were recorded on Site. Of these, 34 species of recognised conservation status in the UK were recorded, including one species currently classed as Red Data Book (RDB1) nationally ‘endangered’ under pre-1994 IUCN criteria (a tephritid fly *Acinia corniculata*); two species classed as nationally ‘vulnerable’ under post-2001 IUCN criteria; two species classed as RDB3 nationally ‘rare’ and four species classed in the ‘near threatened’ post-2001 IUCN category. Two species classed within the RDB ‘unknown’ or Data Deficient (DD) categories were recorded, together with 22 species classed as nationally scarce in the UK. **The invertebrate assemblage as a whole is considered to be of regional importance**’*

This indicates a high level of biodiversity, and our response to the Homes England Scoping Request made clear that further surveys should be carried out to assess whether more rare species are present. The fact that Moths, Longhorn beetles and Bees are not mentioned is a concern, and if they have not been surveyed then this should be a priority.

## **Birds**

West of Ifield has an abundance of breeding and visiting birds, including a large number of protected and priority species. This is confirmed by the records in the SxBRC and the Sussex Ornithological Society submission<sup>26</sup> to the HDC Regulation 18 consultation which scored the Ifield area highly in terms of bird species. The Homes England EIA Scoping Request 2023 states;

*“Breeding bird surveys were undertaken between May and July 2018 and between March and April 2020, with a total of 55 different bird species recorded in 2018 and 46 in 2020. Of these 19 are considered notable.*

*Wintering bird surveys have been completed over the winter season of 2018 – 2019. The surveys found that the site supported a varied assemblage of wintering birds, with a total of 50 species recorded on Site. Of these, 18 were considered notable. On average, around 1110 birds were recorded on each of the four surveys”.*

Amongst the notable birds recently recorded West of Ifield are species of conservation concern and Red Listed due to their decline and vulnerability to habitat loss e.g. Yellowhammer, Skylark, Linnet, Hawfinch, and Mistle Thrush.

In addition, birds classified as Amber Listed<sup>27</sup> such as Tawny Owl, Meadow Pipit, Bullfinch and Common Whitethroat are recorded West of Ifield.

Ifield Mill Pond LWS is regularly surveyed as part of the Wetland Bird Survey (Webs).<sup>28</sup>

Kingfishers occur regularly in the Webs survey records and there are several records of Kingfishers breeding very close to the development site, and the SxBRC report for Ifield Brook BOA includes the following citations:

Ifield Mill Pond LWS: *‘The pond is ornithologically important. Great Crested Grebe, Mallard, Moorhen, Coot, Mute Swan and Grey Wagtail breed. Kingfishers are seen regularly and probably breed nearby. It is an important feeding site for House Martins, Swallows and Swifts. During the winter the pond attracts Mallard, Pochard and Tufted Duck. Water Rail have been recorded in winter’.*

Willoughby fields LNR: *‘Beautiful Damselflies and Kingfisher breed along the streams’*

<sup>25</sup> <https://butterfly-conservation.org/butterflies/white-admiral>

<sup>26</sup> 29<sup>th</sup> March 2020

<sup>27</sup> <https://www.bto.org/sites/default/files/publications/bocc-5-a5-4pp-single-pages.pdf>

<sup>28</sup> <https://app.bto.org/webs-reporting/numbers.jsp?locid=LOC644612>

Local naturalists believe there is one breeding site on the boundary of the development site on the bank of Ifield Brook.

Other local reports indicate a high likelihood of breeding pairs of Red Kites in the immediate area.

## Designated sites and areas of ecological value

The following areas of ecological interest are reviewed roughly in order of distance from the 3,000 house site:

- Ifield Brook Meadows Local Wildlife Site (LWS)
- Hyde Hill Woods LWS
- Willoughby Fields Local Nature Reserve (LNR)
- Ifield Wood
- Ifield Mill Pond LWS
- House Copse SSSI

Although Homes England are currently promoting plans for 3,000 houses West of Ifield, and this is the basis of HA2, they have made clear previously to HDC and in public presentations their aspiration to develop a masterplan for 10,000 houses and a Multi-modal Transport Corridor (MMTC) from Faygate through Lambs Green to Manor Royal / Gatwick. See Map 2 at the end of this document.

While HDC's Sustainability Appraisal and HE's EIA only address the 3,000 house proposal, there are arguments for also considering the impacts of the wider aspiration, and this was the view of HDC in response to HE's 2020 EIA Scoping Request. One of the arguments is the fact that House Copse SSSI would sit right in the centre of the 10,000 house development, with the road (MMTC) passing within metres. The impacts on the SSSI and the surrounding network of ancient woodland and hedgerows would be disastrous, breaking important existing wider ecological networks. While this representation focuses on the impact of HA2, it also makes reference to the key impacts of the 10,000 proposal with Full MMTC.

### **Ifield Brook Meadows Local Wildlife Site**

#### **Summary**

- Ifield Brook Meadows and Wood are 22.8ha of unimproved meadows and woodland around Ifield Brook, sitting directly on the western boundary of the West of Ifield 3,000 site. They are designated both as a Local Wildlife Site (by Sussex Wildlife Trust) and Local Green Space (by Crawley Borough Council). The northern half of the LWS is also part of the Ifield Village Conservation Area. The LWS is a central element of the Ifield Brook Biodiversity Opportunity Area.
- The CBC Local Plan explains in para 14.48 that '*Public consultations have consistently shown that Ifield Brook Meadows and Rusper Road Playing Fields should be protected because of their special value to the local community.*'
- In response to Homes England's EIA 2020 scoping request, Sussex Wildlife Trust said: '*SWT is very concerned about the impacts [of West of Ifield] on Ifield Meadows LWS as presumably it will be surrounded by development. No comment has been made as to how this will impact on its functionality within the District's wider ecological network.*'

## Impact of the West of Ifield

Ifield Brook Meadows run for 1.3km along the western edge of Ifield, connecting the village with the open countryside of Rusper parish. But this is the countryside destined for probably the most densely built part of the West of Ifield. So in effect, Ifield Brook Meadows LWS will be sandwiched between the most densely built part of the proposed development and the urban edge of Crawley. See Map 1 below, showing the extents of LWS, LGS, Conservation Area and ancient woodland, with the West of Ifield site outlined in red.

Habitat fragmentation and biodiversity loss are inevitable. The LWS would be completely surrounded by housing and cut-off from the hedgerows and shaws to the west that provide essential wildlife corridors and connectivity, and should be fundamental to the nature recovery network envisaged when the area was identified as a BOA.

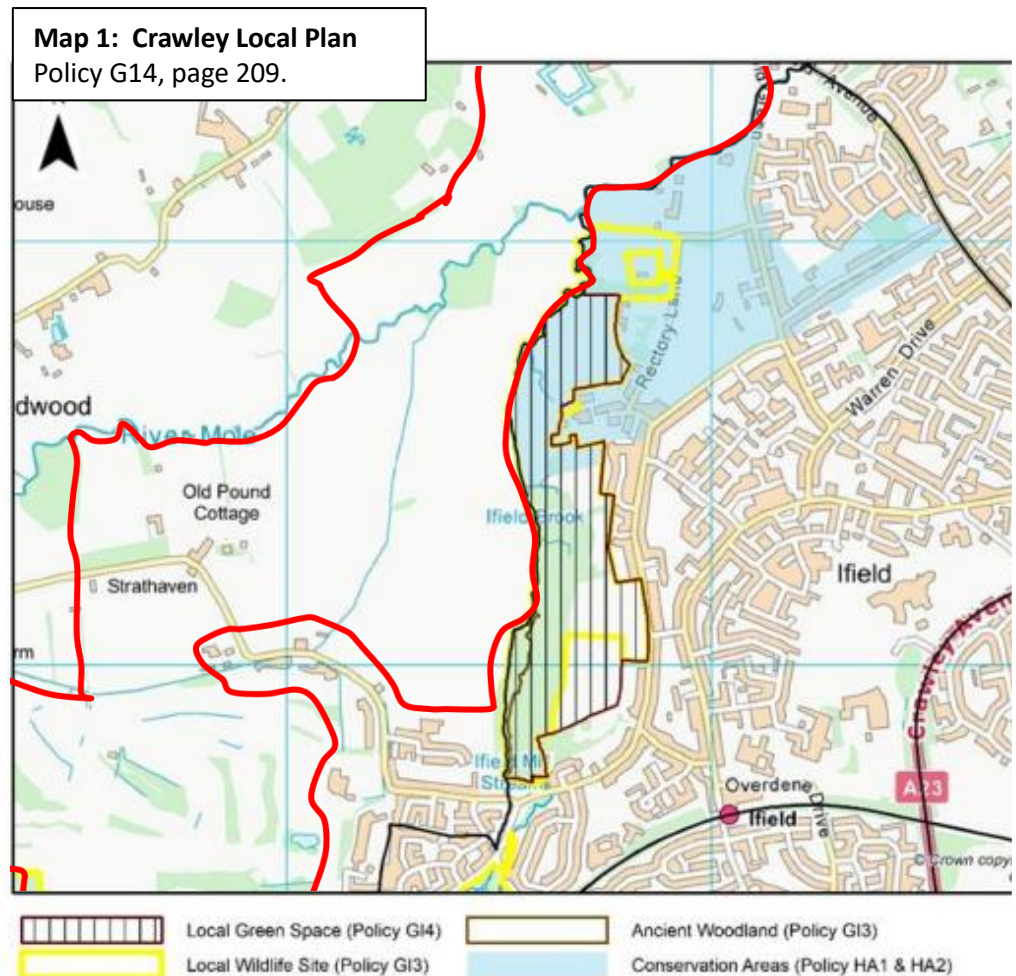
But habitat fragmentation is not the worst impact. Potentially far more damaging will be the footpaths and cycle-paths planned to cross the LWS and their likely heavy use. These paths are not for recreation – the position of the LWS would mean that the most direct access to Rusper Road, Ifield rail station and Ifield shops by foot or bike would be across the Meadows.

Homes England has also suggested converting the LWS into a playground and park.

Effective mitigation seems highly unlikely, even if it were possible. Homes England's EIA Scoping Request 2023 underplays the importance of the LWS, and makes clear that a decision has not yet been taken about whether Ifield Brook Meadows LWS should even be scoped into the EIA for ecological surveying. This seems inconceivable – IBM should be surveyed as a priority. According to Natural England response to the 2020 EIA Scoping Request:

*'The area likely to be affected by the development should be thoroughly surveyed' (in their response to the scoping request). But as mentioned above the EIA doesn't provide evidence that any surveying has been done outside the development site itself – in any of the designated sites or priority habitats identified in the 250m buffer zone or the 2km and 5km study areas. If this is the case then as a priority the following should be surveyed: Willoughby Fields LNR, the Ifield Brook Meadows LWS, Hyde Hill Woods LWS and the Ifield Wood ancient and priority woodland.*

The fact that Homes England are not automatically surveying Ifield Brook Meadows begs the question of whether they, and HDC, do not intend to acknowledge the biodiversity loss on the site boundary in the neighbouring borough, or see the need for baseline assessments for BNG delivery?





## **Ecological value of the LWS**

In various citations for Ifield Brook Meadows LWS the Sussex Wildlife Trust has said:

*“...this LWS is important for its unimproved nature and wide variety of species” and “the value of the site lies in its combination of different habitats, the relatively unimproved nature of many of the fields and its proximity to a large town.”*

*‘Ifield Brook wood and meadows SNCI [LWS] – several herb-rich meadows enclosed by thick hedges, Ifield Brook and an area of woodland. There are several species of butterfly and numerous birds including Kingfisher and Nightingale. ‘*

*‘The LWS comprises a patchwork of grass fields surrounded by blocks and strips of scrub and semi-natural broadleaved woodland, a NERC Section 41 habitat and mosaic habitats*

*The site included a number of blocks and strips of semi-natural broadleaved woodland. The most notable was the block of ancient woodland along the boundary in the south west corner of the LWS. The canopy of this wood comprised mature oak, ash and hornbeam trees, many examples of the latter were coppiced, together with alders along the banks of the Ifield Mill Stream. The understorey comprised holly, field maple, hazel, yew and blackthorn. The cover of field layer vegetation although often rather sparse was fairly species rich with enchanter’s nightshade, male fern, remote sedge, wood sedge, wood melick, wood avens, wood dock, false brome and honeysuckle, ...’*

The Ifield Brook and Ifield Mill Stream flow north along the western boundary of the site, providing river edge habitat and characteristics of the River Mole floodplain.

It supports more than 30 species of breeding birds and 25 species of butterfly.

In conclusion, the high biodiversity value of this site will be severely degraded by the proximity of the new development destroying wildlife connectivity to the west, and by the construction of new access cycle and footpaths, lighting, noise, and inadequate buffer zones. Plus significantly increased recreational footfall will reduce its biodiversity value.

## **Human value of the LGS**

Ifield Brook Meadows currently form Crawley’s only remaining rural fringe, are designated as a Local Green Space and are enjoyed by many walkers and naturalists, as well as protecting the character and views to and from the Ifield Village Conservation Area and Grade 1 St Margaret’s church.

Evidence from three reports is presented to support the case that Ifield Brook Meadows are highly valued by local residents.

First, Crawley Borough Council has designated the area as a Local Green Space – the only one in the borough. The following extract explains why – from the Draft Crawley Borough Local Plan 2024 – 2040, May 2023<sup>29</sup>.

**From Crawley Local Plan policy G14 :**

### ***‘Local Green Space***

*14.47 The NPPF empowers local communities to promote the designation of green areas of particular importance for special protection as a Local Green Space.*

***Strategic Policy G14: Local Green Space*** *The following area is designated as Local Green Space: Ifield Brook Meadows and Rusper Road Playing Fields*

*This area is designated due to its value to the local community and local significance in its function as an area for enjoyment of recreation, visual amenity, tranquillity, wildlife, heritage, and highly accessible countryside close to the urban area. The above area will be safeguarded from development other than in very special circumstances or where the development is to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife.*

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<sup>29</sup> <https://crawley.gov.uk/sites/default/files/2023-05/1.%20Submission%20Crawley%20Borough%20Local%20Plan%202024-2040%20May%202023.pdf>

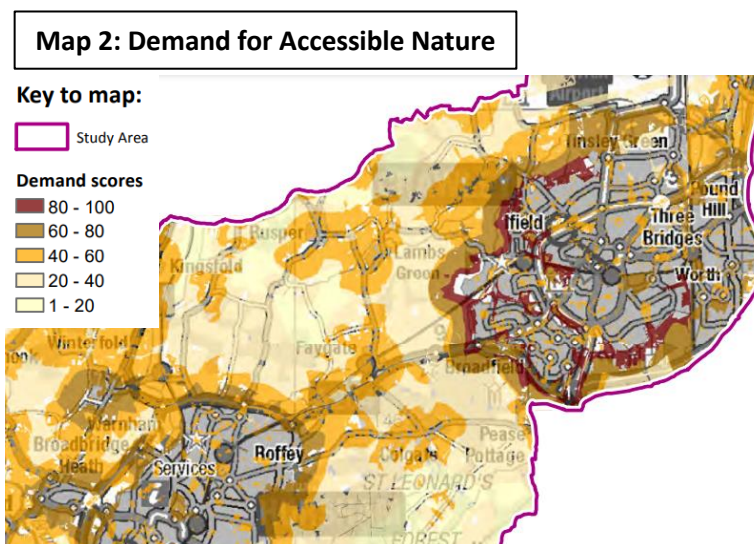
## Reasoned Justification

14.48 Public consultations have consistently shown that Ifield Brook Meadows and Rusper Road Playing Fields should be protected because of their special value to the local community. The Meadows are an important site of nature conservation with distinctive vegetation and wildlife. The northern part of the Meadows is of historic importance, forming part of the Ifield Village Conservation Area, contributing to the setting of the village and church. These elements make this area unique and local in character.

14.49 The presumption in favour of sustainable development does not apply to Local Green Spaces. Proposals affecting the designated Local Green Space should be consistent with national Green Belt Policy.’

The second report is from the Crawley Local Plan Review Evidence Base and suggests that Ifield Brook Meadows is very important in terms of offering residents ‘Accessible Nature’<sup>30</sup>, ie ‘where greenspace or semi-natural habitats give health and well being benefits to people through regular access for walking, cycling or jogging’.

Map 2, of demand<sup>31</sup> to the right shows that demand at Ifield Brook Meadows and around Crawley’s immediate outskirts is assessed to be in the maximum category (top quintile – see purple strip around Crawley). And most of the West of Ifield 3,000 site is assessed to fall into the second highest demand category. The map illustrates how the West of Ifield 3,000 site falls right in the middle of the large area of Accessible Nature for Crawley residents, north-west of the town. This is consistent with the West of Ifield sitting on Crawley’s remaining rural fringe. Also, it is notable how demand around this part of Crawley is considerably higher than around Horsham town.



Third, in its 2018 report of its Landscape Management Plan for the LWS, RSK reported<sup>32</sup>:

*‘In early 2014, a good turnout of local people picked up their spades to plant 360 hedge plants as part of the restoration of an overmature hedgerow. They continued into the first phase of hedgerow coppicing and the creation of dead hedges.*

*Winter 2015 saw the volunteers move onto a second hedgerow and the second phase of coppicing. As well as local residents, volunteers from the local Youth Rangers group were able to get involved’.*

RSK also reported:

*‘Owing to the local sensitivity of the site, RSK liaised with a residents’ group, Ifield Parish, Crawley Borough Council and Sussex Wildlife Trust to ensure local support and understanding of the proposals’.*

Given the RSK work was commissioned by the HCA – Homes England’s precursor – it’s disappointing that Homes England is ignoring this local sensitivity and is suggesting converting the site into a playground and park.

<sup>30</sup> Eco-serv GIS report - Joint Horsham District and Crawley Borough, 2019, (see Accessible Nature Demand on page 18) <https://crawley.gov.uk/sites/default/files/2023-08/Eco-serv%20report%20-%20Joint%20Horsham%20District%20and%20Crawley%20Borough.pdf>.

<sup>31</sup> **METHODS:** Demand is mapped based on population size, health scores, greenspace size and accessibility. The Demand score is based on several combined indicators: population density, health scores and estimated visitation likelihood, based on greenspace size and distance. High values represent areas where there is a higher predicted benefit to those people likely to use each accessible nature site.

<sup>32</sup> RSK, 2018. Homes and Communities Agency: Landholding at Ifield, Crawley. ‘In 2012, the Homes and Communities Agency commissioned RSK to produce a landscape management plan for the SNCI to make recommendations to enhance the ecological value of the site and the public’s use and enjoyment’.

## **Hyde Hill Woods Local Wildlife Site**

### **Summary**

- Hyde Hill Woods is made up of around 23ha of diverse habitat, much of it priority deciduous woodland and around half of it ancient woodland;
- It sits immediately adjacent to Ifield Golf Course on the south side of the 3,000 site and central to the 10,000 site. Given the golf course area will be a densely built residential area the LWS will face increased footfall and significant recreational pressure in the same way as Ifield Brook Meadows. It too is at very high risk of biodiversity net loss;
- The LWS is an important element of the Rusper Ridge BOA, and the rich network of wildlife corridors around House Copse SSSI. *'The small fields between House Copse and Hyde Hill Wood [are remainders of] the lovely landscape pattern - typical Wealden landscape of small copses and fields with ancient hedgerows between.'*
- A roost of Bechstein's bats was recorded in Hyde Hill Woods immediately adjacent to Ifield Golf Course, plus many records of individuals detected across the golf course, probably feeding.

### **Impact of the West of Ifield**

The Hyde Hill Woods site is located with the existing houses of Ifield West to its east, Ifield Golf Course to the north, and the open countryside of Rusper parish to the south and west. See Map 2 below, showing the extents of LWS and ancient woodland, with the West of Ifield site outlined in red.

Since the golf course will be one of the most densely built parts of the proposed development, Hyde Hill Woods will be impacted by the noise and light of the development, as well as increased footfall and presence of dogs and cats. All of these factors will damage the ground flora of the ancient woodland, and disturb breeding birds and mammals. Although privately owned and not crossed by public footpaths Hyde Hill Woods are nevertheless currently accessed by residents of Ifield West for dog-walking, etc. and the expectation is that this will increase. There is a public footpath at the southern end of the LWS.

Hyde Hill Woods should be surveyed as a priority, and as is the case for IBM, it seems inconceivable that a decision has not yet been taken about whether this ancient woodland should be scoped into the EIA.

Hyde Hill Woods is one of the larger areas of ancient woodland in the BOA and therefore important to ... connectivity

### **Ecological value of the LWS**

*'Hyde Hill LWS is a moderate sized woodland on the edge of Crawley which because of its considerable local importance to nature conservation has been selected as an urban LWS' – SWT.*

One of the features contributing to its importance is the combination of habitats, with semi-natural woodland, thick hedgerows, streams and rough grassland – such a combination fosters diversity. The Hyde Hill Brook flowing through the LWS provides a riparian corridor for wildlife.

75% of the site is identified by DEFRA as ancient woodland, and the rest is priority woodland. It forms part of a wider network of woods across the local landscape that are connected by hedgerows. Of particular note is its connection to House Copse SSSI (160m away), an ancient woodland noted for its Small-leaved Lime and Hornbeam coppice, species that are also present within the LWS according to the previous citation. The LWS is considered to provide an important extension to the SSSI.

Also of considerable interest in the LWS are uncommon species including Small-leaved Lime, Wild Service Tree, Midland Hawthorn, and Crab Apple. An uncommon orchid, the Violet Helleborine, was discovered here in 1982.

Two rough fields, which lie adjacent to the southern edge of the wood, are of great importance to invertebrates. An impressive list of 26 species of butterfly have been recorded here in recent years. This includes a number of uncommon or localised species, such as Dingy Skipper, Purple Hairstreak, White Admiral, Silver-washed Fritillary and

Ringlet. Some of these are woodland butterflies which are attracted to the meadows by their abundance of nectar-rich flowers.

The LWS supports a diversity of breeding birds. Birds recorded in Hyde Hill Wood include Goldcrest, Treecreeper, Marsh Tit, Nuthatch, Spotted Flycatcher, Garden Warbler, Stock Dove and all three British woodpeckers.

A roost of Bechstein's bats was recently recorded in Hyde Hill Woods.

## **Willoughby Fields Local Nature Reserve**

### **Summary**

- Willoughby Fields LNR is 25.8ha of unimproved grassland fields, hedgerows, scrub and copses of ancient woodland running along the River Mole. It is an important element of the Ifield Brook BOA, and the wildlife corridors running north along the River Mole into Surrey;
- The site sits within Crawley Borough and is well used by the public for informal recreation;
- Although it sits almost adjacent to the northern boundary of the 3,000 site it will be at some distance from the most densely built areas of the development;
- It will however, be seriously impacted, and possibly destroyed by the Multi-modal transport corridor (by-pass) – an integral part of the 10,000 house proposal. The path of the by-pass is not yet known.

### **Impact of the West of Ifield**

The risk to Willoughby Fields is unknown – at best it could have a by-pass running alongside it, and at worst it could be completely replaced by the road. See Map 2. This road threatens the interconnectivity of the wildlife sites along the river Mole.

Crawley Borough Council is safeguarding the land for possible Gatwick extension and have proposed a number of options for the route of the road none of which would appear to protect the integrity and connectivity of Willoughby Fields LNR and the adjacent River Mole corridor.

### **Ecological value of the LNR**

Willoughby Fields is a large site containing several unimproved grassland fields with a network of hedgerows, areas of scrub and small copses of relict ancient woodland that lies between the River Mole and an unnamed stream on the outskirts of Langley Green in Crawley. The site is well used by the public for informal recreation and it adjoins a rugby club. A considerable amount of tree and hedge planting has been carried out on the site.

The fields all have species rich swards with an abundance of common herbs such as Common Knapweed, Agrimony, Common Bird's-foot-trefoil, Creeping Cinquefoil, bents, Sweet Vernal-grass, Red Fescue and Crested Dog's-tail. In many areas wet flushes and impeded drainage have rushes, Oval Sedge, Meadowsweet and Fleabane.

The hedgerows contain a mixture of native tree and shrub species and provide good sunny, nectar rich edge habitat around the fields. The river's edge is scrub dominated with narrow bands of relict ancient woodland in places and there is a small ancient woodland copse of Hazel and Hornbeam coppice with Ash, Oak, Blackthorn, Bluebell, Moschatel, Ramsons in the north of the site.

Nightingales and warblers, Yellowhammer and Brown Hairstreak butterflies breed in the hedges and scrub. Beautiful Damselflies and Kingfisher breed along the streams. A wide variety of species have been recorded over several years and documented by local naturalist Penny Chatfield on her website<sup>33</sup>.

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<sup>33</sup> <http://willoughbyfields.yolasite.com/>

This site is particularly important as part of the interconnectivity of the Ifield Brook BOA – a contiguous linear habitat from the Gatwick airport wildlife zone to the north along the river Mole and south through Willoughby Fields, along the Mole to Ifield Brook Meadows LWS, then south along Ifield Brook to Ifield Mill pond LWS.

Although Willoughby Fields LNR appears to be under-recorded (according to records in SxBRC) the Gatwick North West Zone – river Mole corridor 1.5km from the LNR – has been extensively recorded over a number of years by the Gatwick Greenspace Partnership<sup>34</sup>. Given these Mole catchment habitats are very similar to the LNR, and the reports indicate high biodiversity and a range of priority species, the starting assumption should be that Willoughby Fields could have similarly high biodiversity potential, and is of course included in the Ifield Brook BOA.

It should of course be acknowledged that the Gatwick Greenspace Partnership has been carefully managing its habitats for a number of years to encourage biodiversity, which will be reflected in the survey results. But their experience and expertise should be sought and used to inform surveying, particularly in Willoughby Fields, and to inform future management of habitats along the Mole corridor. There is no evidence in the HDC Evidence Base or the Homes England EIA Scoping Request that the reports and survey results of the Gatwick Greenspace Partnership have been reviewed, or the ecologists leading the work consulted.

Similarly there is no evidence of cooperation with Crawley Borough Council, or with Surrey Wildlife Trust and Mole Valley District Council who should have been consulted with regard to impacts on the River Mole and the wildlife corridors crossing the county border along the north of Ruspur parish.

### **Ifield Wood**

An undesignated site of roughly 25ha (estimate) of priority deciduous woodland and ‘wood pasture’ immediately adjacent to the north-western boundary of the site.

The area has a wide range of habitats including ponds, wet and ancient woodland, and veteran trees. Much of the woodland is in fact ancient woodland.

In his book *The Land of the Brighton Line*, David Bangs provides some relevant history of the ‘Ifieldwood Commons’:

*‘The Ifield countryside is mostly very flat ... and must have been very difficult to farm, being poorly drained. It could be why so much of it, along with Charlwood to the north, remained as common until so late. It was late too in the form of some of its commons, for both Prestwod and Ifieldwood Commons were wooded, long after most Wealden commons were stripped of their woods and timber. It must have been ecologically very diverse as well, with old pasture pollards on the north western commons, much meadow and rush pasture along the brooks and the Mole, heath at Lowfield Heat, goose lawns at Goose Green and other Ifield greens, and tillage on the lighter ground and Mole terraces. This is medieval time, the parish had a **northern wet and wooded part with much common and deer park**, and a southern part with more tillage’*

This northern wet and wooded part (highlighted) has remained rural and now includes the West of Ifield site. And the part with more tillage has become urban Crawley.

It’s interesting to note that fragments of wet rush meadow survive on Ifieldwood Common today.

David Bangs continues:

*‘Ifieldwood Common retains a continuity of woodland cover though it was worn thin a century ago when much of the western and southern common was grazed tussock pasture. Two ancient pollard Oaks ... next to Oak Tree Farmhouse ... The biggest ... may be 500 years old.*

Although the EIA Scoping Request Report acknowledges (7.4.5) ‘*There are areas of Ancient Woodland immediately adjacent to the north-western, western, south-western and south-eastern Site boundary*’, but this is not expanded on any further. Ifield Wood is not mentioned in relation to habitat and biodiversity, despite its ancient woodland and diverse habitat. And there is no indication that Homes England intend to survey the area.

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<sup>34</sup> <https://www.gatwickairport.com/company/sustainability/biodiversity.html>

Very little recording has been done of species in Ifield Wood, although two maternity roosts of Bechstein's bats were recorded – of 23 and 6 bats – at the edge of Ifield Wood bordering the West of Ifield site.

### **Ifield Mill Pond LWS**

The LWS sits less than 200m from the south-east boundary of the site and links directly to the West of Ifield wildlife network, not least via Ifield Brook. It is an important element in the Ifield Brook BOA.

*'Ifield Pond LWS is a large pond of considerable local importance on account of its birdlife, dragonflies and amphibians. There is also a small semi-natural woodland included in the site with a rich ground flora including Opposite-leaved Golden-saxifrage and the scarce Marsh Violet.'* Ifield Brook BOA – Sussex Biodiversity Partnership

The fact that the pond is ornithologically important and is regularly surveyed as part of the Wetland Bird Survey (Webs) has already been mentioned in the Priority Species section above. Perhaps not surprisingly the SxBRC has a large number of records for birds at Ifield Mill Pond, including the rarer species, in particular rare winter visitors, and breeding birds.

SxBRC also contains many other records for the LWS including 20 butterfly species, and many plants.

In our response to the EIA Scoping Request we noted that although surveys of winter visiting birds have been completed, it's possible that more are needed given that various species arrive and leave at different times, and many surveys will be needed to provide adequate coverage. The monitoring and recording of winter visitors at Ifield Mill Pond LWS should be used a data source.

The pond is popular with local residents, and would definitely be impacted by extra recreational pressure from the West of Ifield, with a resulting high risk of biodiversity net loss. The risks to breeding birds are of particular concern.

### **House Copse SSSI**

#### **Summary**

- House Copse sits 660m from the boundary of the West of Ifield 3,000 site and would be right at the centre of the 10,000 house site, metres from the by-pass;
- It is designated as an SSSI because it is a particularly rare type of ancient woodland almost unknown elsewhere in Southern England – Small-leaved lime and Hornbeam coppice – with a high likelihood that the site has had a continuity of cover since the Middle Ages;
- The 12.3ha of House Copse sits at the centre of a rich and highly inter-connected network of ancient and priority woodland, shaws and hedgerows. This network would be completely destroyed by the 10,000 house proposal, and the associated by-pass, resulting in severe habitat fragmentation and likely ecological isolation of House Copse

#### **Impact of the West of Ifield**

House Copse sits 660m from the boundary of the West of Ifield 3,000 site and would be right at the centre of the 10,000 house site, metres from the by-pass.

#### **Impact of 3,000 houses**

House Copse SSSI is legally protected under Section 28 of the Wildlife and Countryside Act 1981 and therefore development work near this site requires detailed survey and an impact assessment across the surrounding area. NPPF paragraph 180 states that development **near** an SSSI or an ancient woodland should only be approved in exceptional circumstances. DEFRA<sup>35</sup> identify House Copse as ancient woodland, and initial surveys completed for

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<sup>35</sup> Ancient woodland designations from Natural England Open Data Publication, Defra group ArcGIS Online organisation. <https://naturalengland->

Save West of Ifield indicate that a number of other sites in the surrounding area are ancient woodland and of high botanical value. House Copse SSSI is at the centre of this network of ancient woodland and will be severely impacted by nearby development.

Detailed survey work and impact assessment is required and to date there is no survey or ecological data or analysis in the HDC Evidence Base, or published by Homes England. This is a particular example of the lack of adequate up to date surveys, which are required to support the Local Plan and the allocation of the site.

### **Impact of 10,000 houses and WRR**

The whole area for miles around House Copse is a network of ancient and priority woodland, hedgerows and shaws. This is why it is recognised as a BOA. But the 10,000 proposal and the by-pass would completely destroy this network – hedges, shaws and copses would be severed or removed altogether resulting in very adverse habitat fragmentation, and possible ecological isolation of House Copse. See Map 2. **This contravenes NPPF 180b and 180c.**

The woodland connected to House Copse is quite possibly as important as House Copse and equally integral to the Nature Recovery Network, but this is unknown because it hasn't been surveyed and evaluated.

Development should not take place until these sites have been fully evaluated.

### **Ecological value of the SSSI**

The Natural England citation for House Copse states that it is

*'a small isolated woodland, which is shown on the 1st Edition 1" Ordnance Survey Map (1816) to have much the same shape and extent as at present. There is much to suggest that it is an 'ancient' woodland with continuity of woodland cover since at least the Middle Ages. This type of woodland cover is rare, being a close association of small-leaved lime and hornbeam, previously managed as coppice, under oak standards, and is almost unknown elsewhere in Southern England'.*

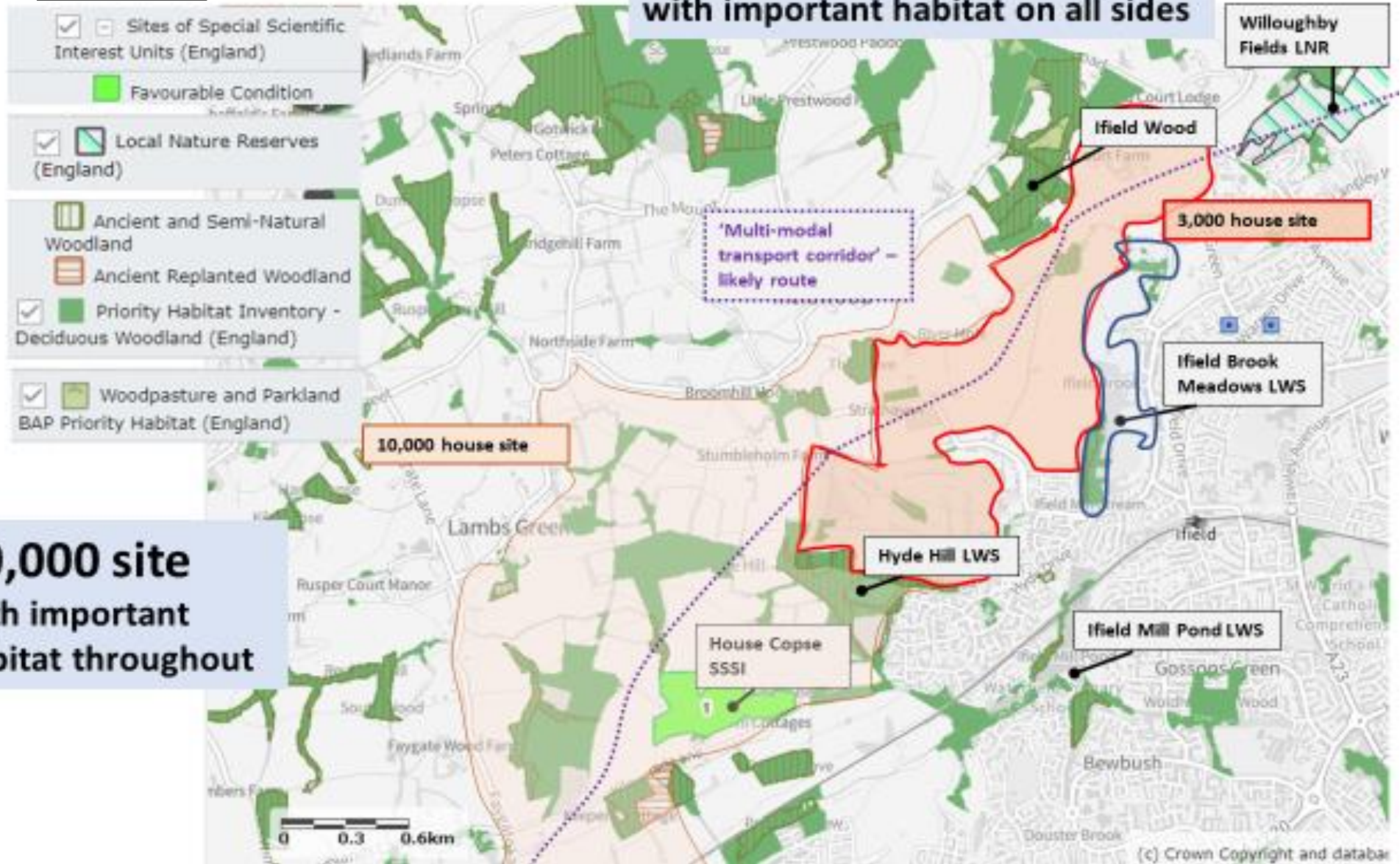
The Small-leaved lime was once (5,000–7,000 years ago) a common component of Wealden woodlands, but today it has almost disappeared from the area, limewoods now being mainly restricted to East Midlands and East Anglia. House Copse is therefore, a wood of great interest both botanically and historically and is one of the best examples of its kind known to South East Region.

We have species lists for House Copse, surveyed on several occasions by Frances Abraham of the Sussex Botanical Recording Society. Many species recorded are those most often associated with ancient woodland.

Around House Copse and Hyde Hill there are field margins and set aside fields rich in wildflowers which provide food for species such as as Goldfinch which are present in large numbers in the autumn.

# MAP 2.

## West of Ifield 3,000 site with important habitat on all sides





# Save West of Ifield Regulation 19 Response<sup>36</sup> - Supplementary Document B Policy HA2 and the Allocation of Land West of Ifield

## Presence of Bechstein's bat

This document provides evidence for the presence of Bechstein's bats roosting and feeding across the West of Ifield site. The records from the Sussex Biodiversity Records Centre (SxBRC) are briefly summarised, ahead of a report from Martyn Cooke – bat expert and organiser of the Mole Valley Bat Project focussed on the Bechstein's bat. The main points are:

- Survey work between June and September 2021 has recorded many new roosts across and around the West of Ifield site, including right at the centre of the area destined for the densest build.
- Radio-tracking has revealed that these roosts are part of one very large colony which extends from the north of Rusper village to the north of Charlwood and eastwards to Ifield and the A264. To date over 15 tree roosts have been located including at least five maternity roosts. From emergence counts there are over 200 individual bats, possibly more, within the colony.
- **This makes the colony one, if not the biggest colony found within the UK and is of National and potentially International importance. The area should be considered for designation as a Special Area of Conservation (SAC).**

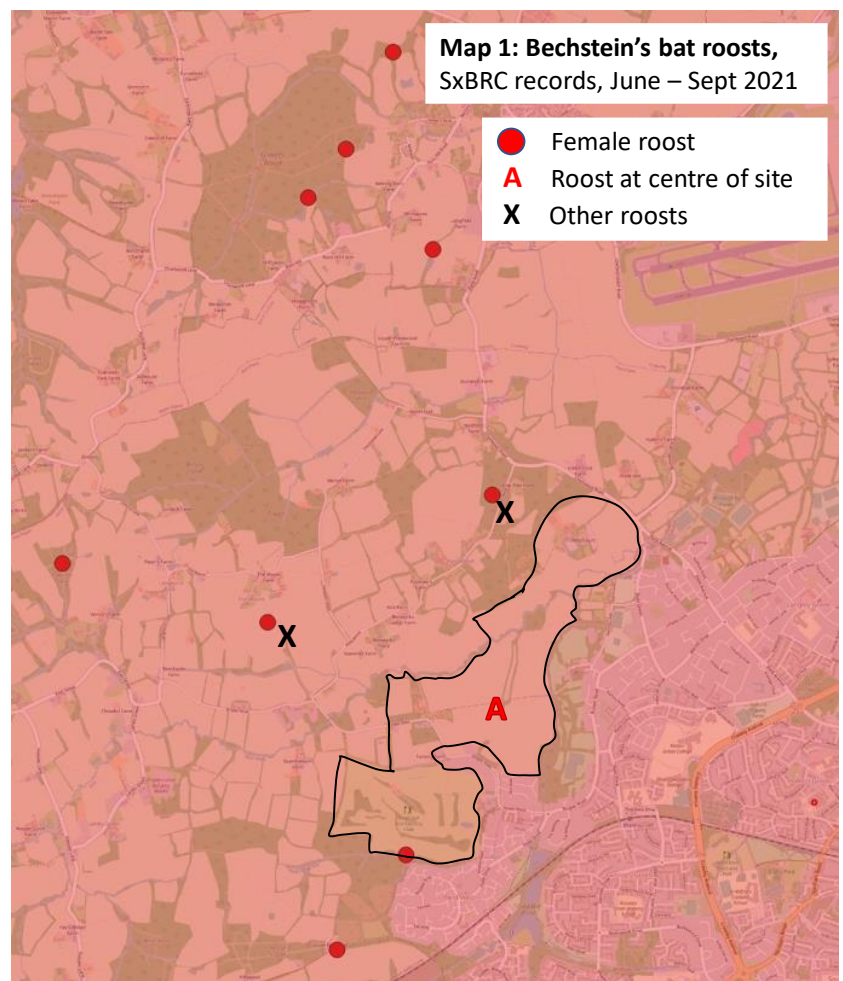
## Summary of recent SxBRC records

Between June and Sept 2021 88 records were submitted for Bechstein's bats, including across and immediately adjacent to the WOI site. Some of these records are for roosts of 20+ individuals, so the number of individuals is much higher than 88.

These records are particularly exciting because many of the roosts were not previously known to local experts and so not recorded. And because some of the new roosts are large maternity roosts, which is very important for understanding the local demographics of the population.

The records concerning roosts are presented in Table 1 and Map 1, and can be summarised as follows:

1. A roost of at least 20 bats was recorded at the heart of the site of 3,000 house site. See A on Map 1.
2. Two maternity roosts are recorded in Ifield Wood – of 23 and 6 bats – immediately adjacent to the site.
3. An unspecified roost is recorded in Hyde Hill Woods immediately adja-



<sup>36</sup> This document has been prepared on behalf of the Save West of Ifield residents' group by Martyn Cooke, Peter Townend and Fenella Maitland-Smith.

cent to Ifield Golf Course. Unfortunately the size and type of roost is not specified.

4. Another maternity roost of 57 was recorded on The Mount - less than a mile from the site.
5. And another maternity roost of 23 in Lambs Green – 1.5 miles from the site.
6. Plus 40 records of individuals detected on the West of Ifield site including the golf course, probably feeding.

**Table 1 – SxBRC records for Bechstein’s bat - *Myotis bechsteinii***

Date	Grid reference	Location name	Abundance	Sampling method	Roost type	Roost location	Comments
02/09/2021	TQ242374	Land West of Ifield	25 Bat(s)	Bat Survey	Unspecified Roost	Unknown	WOI arable fields - 1/4 mile crossing
15/08/2021	TQ242374	Land West of Ifield	23 Bat(s)	Bat Survey	Unspecified Roost	Unknown	WOI arable fields - 1/4 mile crossing
07/06/2021	TQ2316336606	Woodland west of Ifield Golf Course	Present Bat(s)	Bat Survey	Unspecified Roost	Tree	Hyde Hill woods
15/08/2021	TQ2413738676	Ifield Wood	23 Bat(s)	Bat Survey	Maternity Roost	Unknown	Ifield Wood west
18/08/2021	TQ2424138640	Ifield Wood	6 Bat(s)	Bat Survey	Maternity Roost	Unknown	Ifield Wood east
31/08/2021	TQ2275237869	Mount Farm copse	57 Bat(s)	Bat Survey	Maternity Roost	Unknown	The Mount
24/08/2021	TQ2273637847	Oak on Mount Farm	Present Bat(s)	Bat Survey	Unspecified Roost	Tree	The Mount
09/06/2021	TQ2285837767	Tree line south of The Mount	Present Bat(s)	Bat Survey	Unspecified Roost	Tree	The Mount
05/06/2021	TQ2139038192	Dumbrels Copse	23 Bat(s)	Bat Survey	Maternity Roost	Unknown	N of Venters

## Report by Martyn Cooke

Martyn Cooke is a Natural England licenced bat worker holding both Class 3 and Class 4 bat licences. Since 2012 he has organised the Mole Valley Bat Project which mainly focuses on the local Bechstein’s bat population. He is a member of the UK Bechstein’s Bat Study Group and the Mole Valley DC Conservation Group. He is also an active member of both Surrey and Sussex Bat Groups

## BECHSTEIN’S BAT (*Myotis bechsteinii*)

Bechstein’s bats are medium sized insectivorous bats found across Europe and as far east as the Black Sea. They are uncommon throughout their range and have been classified as ‘**Near Threatened**’ and their population ‘**Decreasing**’ on the **IUCN Red list**. In the UK they are only found south of a line from mid-wales to Kent. Whilst all bats are classed as ‘**Protected Species**’, and receive legal protection (Wildlife & Countryside Act 1981, as amended). Bechstein’s are also listed on **Annex II of the European Habitats Directive**, which gives them enhanced protection and they are a **UK Biodiversity Priority Species** (JNCC 2007).

### Habitat

Bechstein’s are woodland bat specialists and use their large ears to listen for, and then glean insects from foliage and the woodland floor. In the UK they are heavily associated with mature Oak trees within ancient and semi-ancient woodland. They also make extensive use of hedgerow Oak trees.

Ancient/semi-ancient woodland, Lowland mixed deciduous woodland, Hedgerows, Ancient and Veteran trees are all UK priority habitats (NERC 2006).

## Roosts

These are almost exclusively found within tree cavities particularly Woodpecker holes and rot holes. Male bats tend to be solitary apart from the mating season whilst female bats roost in small groups. During the birthing period May-July smaller groups of females come together to form a maternity colony of between around 20-50 bats. If roosting opportunities are limited maternity colonies of 100 bats are sometimes found. These roosts are generally found within around 50m of a water source that is present during the summer months.

*The only known Bechstein's maternity roost in the UK found within a building is located on the eastern side of Crawley, which has been monitored annually for almost 20 years.*

## Core Sustenance Zones

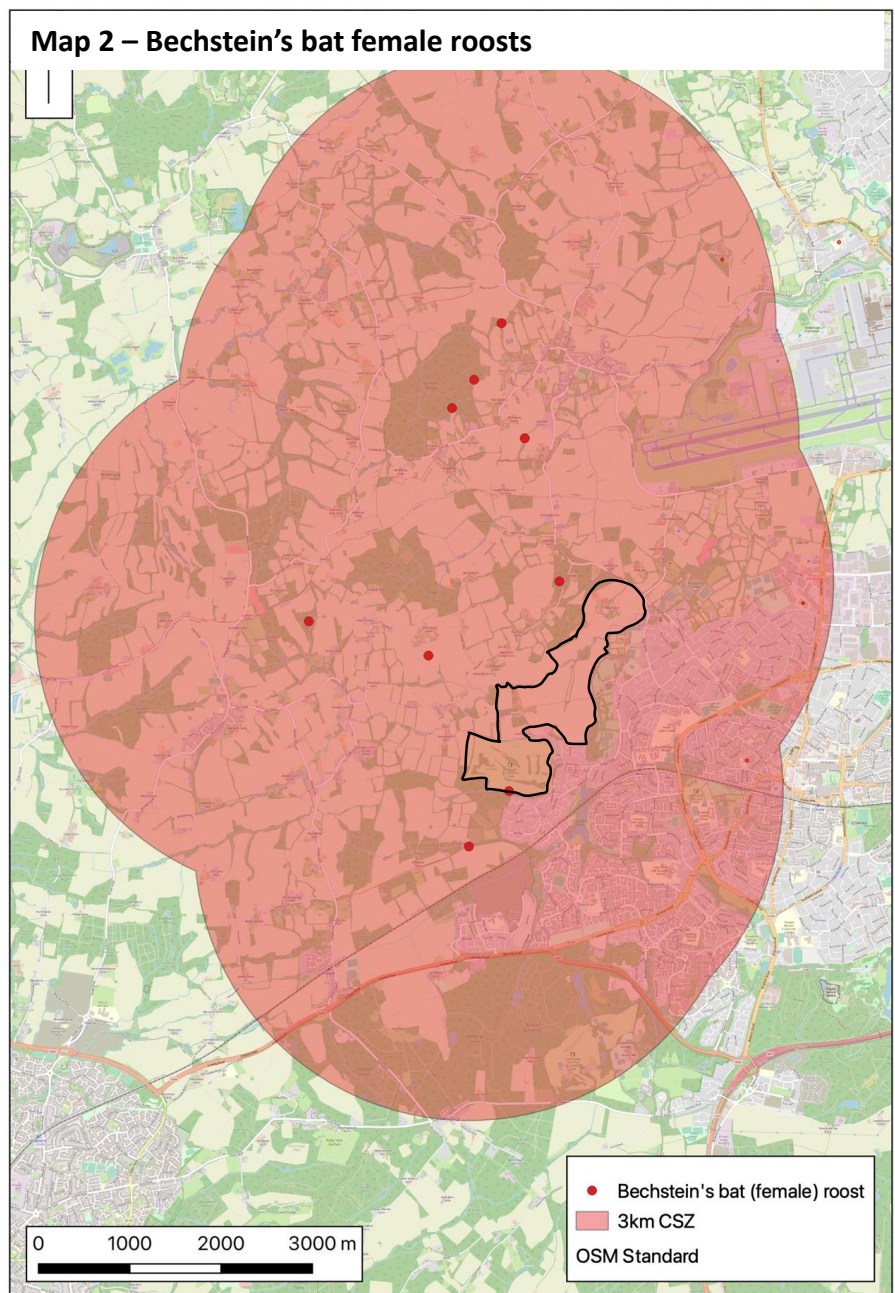
A core sustenance zone (CSZ), as applied to bats, refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost. In the case of Bechstein's this has been set at 3km radius from the roost. For more information on CSZ please see the following link,

<https://cdn.bats.org.uk/uploads/pdf/Bat-Species-Core-Sustenance-Zones-and-Habitats-for-Biodiversity-Net-Gain.pdf?v=1596874016>

## Local Population

The first Bechstein's bat confirmed in our local area was captured in 2005 within the Glover's Wood complex. The capture survey was part of a study by the University of Sussex and which led to the Bat Conservation Trust (BCT) launching their successful 'Bechstein's Bat' Project in 2008. Following the BCT project the 'Mole Valley Bat Project' was set up in 2012 to continue the work already undertaken. In 2014 the first Bechstein's was caught within Brockley Wood located at Gatwick Airport. Work looking how the bats are using the airport land and wider area, using radio-tracking, has continued ever since. **The land earmarked for the 'West Ifield' housing development is particularly important.**

Bechstein's follow what is known as a 'Fusion/Fission' roosting pattern. Female bats meet in small groups but then quickly split forming new groups. Ringing studies have found that these bats are not necessarily related and these 'social groups' are thought to strengthen the bonds within the whole colony. From radio tracking studies across Europe it has been shown that Bechstein's colonies are territorial and bats from adjacent colonies do not mix. Male bats scatter through the landscape so genetic mixing is



achieved. In addition Bechstein's, in common with other Myotis species, congregate at Autumn Swarming sites which may help with the genetic mixing.

From capture surveys we first thought we had around 3 to 4 separate colonies of Bechstein's within the local area however from radio-tracking we have found this to be incorrect and in fact we have ONE very large colony which extends from the North of Rusper village to the North of Charlwood and eastwards to Ifield and the A264. To date over 15 tree roosts have been located including at least 5 maternity roosts.

From emergence counts there are **over 200 individual bats**, possibly more, within the colony.

**This makes the colony one, if not the biggest colony found within the UK and is of National and potentially International importance.**

The following map shows the positions of known tree roosts used by female Bechstein's along with the associated CSZ. Roosts used by solitary males are not shown.

## Planning

The heavy Wealden clay covering most of our area is not favourable for large scale arable agriculture therefore field sizes have remained small. Ancient Hedgerows and mature hedgerow trees, particularly Oaks have remained intact and the area contains numerous small copse which are all well connected. Large amounts of ancient/semi-ancient woodland also survive as do small field ponds. This mosaic of landscape features is crucial for the Bechstein's to survive and prosper.

In recent years there has been a big outcry at the felling of woodland for development. Although pockets of woodland are left as islands, adjacent habitat including ancient hedgerows and hedgerow trees, which are essential for habitat continuity, are being progressively destroyed. This is causing adverse impact on ecosystem function. The local Bechstein's bat population needs extensive, landscape scale habitat continuity to survive and any development pressures on this already fragile ecosystem will be deleterious to the long-term survival of this notable population.

Studies have also shown that major roads, such as the proposed **Western Relief Road** have a detrimental effect on bats. This is due to several factors including light, noise and fatalities due to collisions with vehicles. The proposed relief road would effectively cut the known Bechstein's colony in half. This would severely impact the movement of bats between roosts and thus impact on genetic diversity within the colony and its long-term viability. Favourable foraging habitat would be separated from roost sites and the health and fitness of individuals could be compromised leading to reduced breeding success.

## Mole Valley DC Local Plan

As the council is well aware of the importance of our local Bechstein's populations they were taken into account when the Local Plan was produced.

### *POLICY EN9: NATURAL ASSETS*

*8. Within the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), as shown on the Policies Map, there will be a strong presumption against new development unless the impact on the integrity of the SAC can be mitigated. An Environmental Impact Assessment and Habitats Regulations Assessment will be required. Development proposals for sites within 1.5km of the SAC will be required to meet the requirements of the Habitats Directive, particularly in relation to the Bechstein's bat qualifying feature. Habitats suitable for foraging and commuting bats from the SAC (such as deciduous woodland, mature treelines, species rich pasture or river corridors) must be preserved unless surveys demonstrate that they are not used by bats. Care must also be taken through development design to ensure that retained features are not impacted by artificial lighting. Developments within the Thames Basin Special Protection Area buffer zone, as shown on the Policies Map, will be required to be screened to ascertain if further assessment under the Habitat Regulations is necessary.*

### *POLICY D3: DEVELOPMENT SITES*

*Within the plan Bechstein's are detailed in several of the listed Development Sites*

*"Incorporate any mitigation measures required to address potential adverse effects on the integrity of the Mole Gap to Reigate Escarpment Special Area of Conservation, with particular regard to impact on foraging and commuting habitat suitable for Bechstein's bats".*

The sites listed are;

DS:6, Betchworth, DS:14, Brockham, DS:15, Buckland, DS:16, Buckland, DS:23, Dorking, DS:34, Dorking, DS:36, Dorking and DS:40 Headley.

### **Biodiversity Opportunity Area**

The area of land South West of Charlwood village, to the boundary between Mole Valley DC and Horsham DC has been designated by Surrey Wildlife Trust as the Low Weald Biodiversity Opportunity Area. This will form part of a larger area which has been designated by Sussex Wildlife Trust, within Horsham DC area, in the area West of Ifield.

### **Horsham DC Local Plan**

When considering its Local Plan, Horsham DC must consider the presence, and importance, of the Bechstein's colony in the area shown above. **Large scale development should not be permitted** and for small scale developments safeguarding measures should be implemented to ensure compliance with Annex II species legislation, such as minimal lighting etc.

It should be pointed out that if the letter of the European Habitats Regulations were followed, **Natural England should designate the area as an SAC.**

# Save West of Ifield Regulation 19 Response<sup>37</sup> - Supplementary Document C Policy HA2 and the Allocation of Land West of Ifield

## Response to Homes England' West of Ifield EIA Scoping Opinion Request, 2023

The response addresses issues in the order they appear in the EIA document.

### Introduction and site description

#### 1. Assessment of the potential cumulative effects of the full 10,000 development and Relief Road should be scoped in.

Although Homes England are currently promoting plans for 3,000 houses West of Ifield, they've made clear in previous stakeholder presentations that this is phase 1 of a masterplan for 10,000 houses and a Western Link Road (bypass) from Faygate through Lambs Green to Manor Royal / Gatwick.

But there is no mention at all of this masterplan. This is a change from the 2020 EIA scoping request which discussed Potential Cumulative Effects, including (para 4.8.6) *"Potential future expansion of a wider West of Crawley Garden Town Strategic Opportunity to the south-west of the site that could comprise in total approximately 10,000 new homes when including the proposed homes as part of the proposed Development. There are no specific proposals for this wider opportunity at the moment, however dialogue is ongoing through the HDC Local Plan preparation process."*

The implications of the full 10,000 proposal with WLR must be assessed now. This approach is in line with the responses from Horsham and Crawley planning officers to the 2020 EIA:

- a. Jason Hawkes (Horsham District Council Principal Planning Officer) wrote: *'Reference should also be made here to the aspirations of the [3,250] site to be part of a wider scheme for up to 10,000 dwellings for the land to the west of Crawley. The land west of Ifield is the first phase of this wider development which is intended to deliver a link road joining the A264 to the south to the A23. It is important that this narrative is outlined in the EIA so that cumulative impacts can be considered where necessary.'*
- b. And Crawley Borough Council (CBC) responded similarly: *"Homes England has promoted a much more extensive development for up to 10,000 homes on land West of Ifield. While this is understood to be speculative, the other proposed phases should be identified in some way or at least recognised. This is critical as some of the proposed solutions for the ES and the proposed development may be affected by the potential further expansion of the development over the longer term (for example flood mitigation or biodiversity). It would also allow the cumulative impacts to be better assessed."*

Similarly the new legislation around Biodiversity Net Gain includes specific policy for large residential developments to be delivered in a phases, such that applicants will be required to explain (at OPA) the strategy to achieve the biodiversity gain objective across the whole site and to demonstrate how this could be delivered on a phase-by-phase basis<sup>38</sup>. While the planning application will principally refer to the 3,000 site, we would expect significant reference to the potential for the 10,000 development in the Homes England EIA.

#### 2. The Site description (part 2) should paint an accurate high-level picture of the site and its surrounding context. The 2023 text is inadequate, and has been watered down and shortened since the 2020 draft.

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<sup>37</sup> This document has been prepared on behalf of the Save West of Ifield residents' group by Peter Townend and Fenella Maitland-Smith.

<sup>38</sup> See the Government's current policy position regarding BNG for phased development here – Feb 2023:

<https://www.gov.uk/government/consultations/consultation-on-biodiversity-net-gain-regulations-and-implementation/outcome/government-response-and-summary-of-responses>

References to the floodplain and neighbouring Local Wildlife Sites (LWS) and Local Nature Reserves (LNR) have been removed and should be reinstated, CBC's call for more context in respect of Crawley town should be respected, and the fact that the development is in the rural parish of Rusper should be acknowledged.

There are also factual inaccuracies that should be corrected:

- a. In 2020 CBC gave strong advice<sup>39</sup>, with several examples, that the EIA did not explain the context of the development in relation to Crawley: *'there is concern that there is no apparent understanding of the site's context in relation to Crawley Borough and that the importance of the and its relationship to the town is downplayed'*. The 2023 draft has not responded, and in fact Part 2 has been reduced in length.
  - b. Previously CBC highlighted errors *'... the description of the site bears little resemblance to the red-edged site plan...'* and *' the whole analysis appears to exclude any reference to the golf course or the relationship of this land as important section of countryside along the western edge of Crawley.'* These points still stand.
  - c. Para 2.2.4 mis-describes the surrounding area to the South – Rusper Rd is not the southern boundary – rather the golf course forms the boundary with Ifield West and Hyde Hill Woods LWS (as pointed out in 2.1.2) with the Maples making up a smaller portion to the south-east.
  - d. Para 2.2.4 also fails to mention neighbouring LWSs and the LNR in describing the surrounding area. And in particular is incorrect in suggesting the site abuts Ifield village to the East, when it abuts the Ifield Brook Meadows LWS.
  - e. There is no reference to the fact that the site forms Crawley's only remaining rural fringe, its importance for recreation, and hence its importance to Crawley residents,
  - f. There is also no mention of Rusper parish, and the assumption seems to be that all impacts will be felt by the environment and residents of Crawley and Ifield. Rusper is the most rural parish in Horsham District, with country lanes but no major roads, heavily wooded Low Weald landscape and habitat, and historic hamlets, farms and village. The character of the parish will be severely impacted, as will the levels of traffic on the country lanes.
3. **As a general point, there seems to be confusion, or inconsistency, around the positioning of the development site boundary on the eastern side. In particular, whether Ifield Brook Meadows LWS are part of the development site or not. The inconsistencies should be corrected.**

The map at Figure 2.1: *Proposed Development Site* shows the Application Site Boundary (red line) sitting to the western edge of Ifield Brook Meadows, indicating that they are not within the development site. Similarly, under Habitats in para 7.4.5: *'... Ifield Brook runs flows south to north along the eastern Site boundary (forming the boundary between the Site and the adjacent Ifield Meadows LWS).'*

But para 7.4.5 contradicts this: *'The nearest sites are Ifield Brook Wood and Meadows LWS and Hyde Hill LWS which are within the boundary of the Proposed Development...'*. And as mentioned above para 2.2.4 suggests that the site abuts Ifield village to the East, which could only be the case if Ifield Brook Meadows LWS is part of the site.

## Establishing the Baseline – evaluating habitat and species

### Habitat

4. **Properly up to date extracts from the SxBRC and SBIC should be assessed and form part of the baseline.**

In para 4.3.4 it is stated that the current baseline is 2023 unless otherwise stated. But the list of the baseline data (para 7.4.1) used to determine the Study Area and Zone of influence shows that they range from 2007 to 2018, and so are certainly not up to date as claimed in 7.3.4.

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<sup>39</sup> [https://iawpa.horsham.gov.uk/PublicAccess\\_LIVE/Document/ViewDocument?id=AA0477E418F011EB8F1058FB8467EA8B](https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=AA0477E418F011EB8F1058FB8467EA8B)

**The reports and survey results of the Gatwick Greenspace Partnership should be reviewed alongside up to date extracts from SxBRC and SBIC.**

The proposed site has been seriously under-recorded in the past and so the SxBRC is likely to suggest inaccurately low levels of biodiversity for the site itself. Much of the surrounding area however has been recorded more extensively – both by amateur naturalists and by experts – in particular the LWSs of Ifield Brook Meadows and Ifield Mill Pond, and the Gatwick North West Zone (river Mole corridor 2.3km from the site).

Evidence from the SxBRC, SBIC and the Gatwick Greenspace Partnership reports<sup>40</sup> shows that where more surveying and recording has been carried out the area has a high incidence of priority species which will be impacted by development. The Gatwick Greenspace Partnership has carried out extensive recording over a number of years in river Mole catchment habitats very similar to the proposed site, and reports high biodiversity and a range of priority species. It should of course be acknowledged that the Gatwick Greenspace Partnership has been carefully managing its habitats for a number of years to encourage biodiversity, which will be reflected in the survey results. But their experience and expertise should be sought and used to inform surveying, particularly in Willoughby Fields, and to inform future management of habitats along the Mole corridor.

One good outcome of the planning process is that the ecological surveying should increase our knowledge. For example the newly identified colonies of Bechstein's Bat both in and around the development site which appear to be linked to the colonies around Charlwood.

5. **It's not clear that Homes England has consulted with any non-statutory stakeholders such as Sussex and Surrey Wildlife Trusts, local naturalists, and the Gatwick Greenspace Partnership. This is contrary to para 7.3.6 of the draft EIA which states that 'The effects on Biodiversity will be assessed in accordance with CIEEM (2018) Guidelines'<sup>41</sup>**

There are a number of local naturalists and organisations who know the area well, have their own records and could advise on where and when to observe certain species.

Consultation with them would be in line with the CIEEM Guidelines: '2.11: ... Where there are potentially significant effects on ecological features of particular value to communities or user groups (e.g anglers), it is important to consult with those communities or groups... 2.12 Statutory and non-statutory consultees have an important role in providing site-specific data, contextual information and expertise. Consultation will enable evaluation and agreement of the scope and methods of any investigations, including the period for data collection. 2.13 Preliminary discussions with stakeholders should determine: • ecological features that could be affected, • appropriate assessment methodologies. 2.14 There should also be discussions as early as possible with key stakeholders regarding: • potential strategies to avoid or minimise any negative impacts, • potential ways of compensating for any significant negative residual effects (after mitigation), • objectives for enhancement, including, where appropriate, net gain for biodiversity.'

6. **The current draft does not adequately explain the spatial scope of the assessment. Paras 7.3.4 and 7.3.5 are confusing and unclear and should be redrafted in line with the approach described in the CIEEM Guidelines.**

There is no clear description of the spatial scope of (area covered by) the 'zone of influence' (para 2.29 of the CIEEM Guidelines) – it could be the 2km and 5km zones around the development site described in para 7.3.4 and 7.3.5, although these are referred to as study areas? It is also unclear what is meant by the 'field study area' – a 250m buffer around the development site.

There is also a lack of clarity around which areas have been surveyed to date, and where future surveys might be appropriate. It's not even clear if surveys have been conducted in any areas outside the development site, in the 250m, 2km or 5km zones.

Para 7.3.4 opens with 'The study area is the area within which habitat and targeted species surveys have been undertaken to date' which suggests that surveys have been conducted within the 2km and 5km zones. Similarly

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<sup>40</sup> <https://www.gatwickairport.com/company/sustainability/biodiversity.html>

<sup>41</sup> CIEEM Guidelines for Ecological Impact Assessment Version 1.1 - Updated September 2019 <https://cieem.net/wp-content/uploads/2019/02/Combined-EcIA-guidelines-2018-compressed.pdf>



para 7.4.2 explains ‘An ecological walkover of the study area identified habitats likely to be of nature conservation value, and the potential for protected or notable species of plants and/or animals to be present. Targeted species surveys were undertaken during 2018 to 2023.’ Again, the implication is that surveys have been conducted within the 2km and 5km zones, although this is not confirmed.

But nowhere in the EIA is there actually an explanation of how the ecological value of designated sites (and other features) has been or will be assessed. The designated sites within the 2km and 5km zones are described, but without any mention of surveying. Justifications for scoping in or out are based on distance from the site, not the presence or absence of ecological features. This should be clarified, with reference to para 2.29 of the CIEEM Guidance which states that the conclusions of the scoping process should include ‘... • a description of the surveys to be undertaken to provide the necessary data to inform the assessment, including methods and timing, and • a list of relevant ecological features that will not be given detailed consideration in the EIA and a justification for their exclusion.’

7. **Only 3 (or possibly 4) designated sites have so far been scoped in, despite the fact that there are 13 within 2km of the development site. Most of these should be scoped in and surveyed. There should be no question about the sites immediately adjacent to the site, and Ifield Brook Meadows, Hyde Hill Woods should be scoped in and surveyed as a top priority. Ifield Mill Pond is also a priority to be scoped in.**

Although 13 designated sites have been identified within the 2km zone, there is not yet any indication which of these will be given ‘detailed consideration’, as is advised by CIEEM (para 2.29). And some have already been scoped out. The full list is given in Table 1 below with SWOI comment. Table 1 also gives designated sites within the 5km zone for bats.

It seems inconceivable that a decision has not yet been taken about whether Ifield Brook Meadows LWS should be scoped in. In its response to the 2020 scoping request, Sussex Wildlife Trust said: ‘SWT is very concerned about the impacts on Ifield Meadows LWS as presumably it will be surrounded by development. No comment has been made as to how this will impact on its functionality within the District’s wider ecological network.’

In summary, our main concerns with the EIA process are:

- a. That there may have been no surveying of the sites immediately adjacent to the site, ie Willoughby Fields LNR, the Ifield Brook Meadows LWS, the Hyde Hill Woods LWS.
- b. It seems as if the only things identified in the 2km and 5km zones are designated sites, not important species and habitats. Non-designated areas such as Ifield Wood are significantly large areas of priority habitat (as defined by DEFRA) and should be surveyed.
- c. In general, the way the assessment is described doesn’t inspire confidence that it is being conducted in line with the CIEEM Guidelines. It appears to be confused and vague, and there must be concern that it will not adequately evaluate ecological features for the baseline.

**Table 1: Designated sites within 2km and 5km of the development site boundary**

Site	Designation	Draft EIA proposal	SWOI comment	Distance from development boundary (km)
<b>Sites within 2km of site boundary</b>				
House Copse	SSSI	Scoped IN	How will the detailed assessment be done? Have any surveys been done and are any planned?  Local naturalists would be happy to share recent botanical surveys by Sussex Botanical Recording Society.	0.665

Buchan Hill Ponds	SSSI	Scoped IN	How will the detailed assessment be done? Have any surveys been done and are any planned?	1.6
Willoughby Fields	LNR	Scoped IN	How will the detailed assessment be done? Have any surveys been done and are any planned?	0.33
Target Hill Park	LNR	Unclear. Scoped IN <i>'based on the potential for adverse effects as a result of increased recreational pressure'</i> (7.4.5). But scoped OUT because more than 1.7km from site (7.4.6)	Should be scoped IN for the reasons given in para 7.4.5.  How will the detailed assessment be done? Have any surveys been done and are any planned?	1.9
Ifield Brook Meadows	LWS	Not yet decided	Should be scoped IN and surveyed as a top priority. In terms of risk or impact, Ifield Brook Meadows LWS will be sandwiched between the most densely built part of the proposed development and the urban edge of Crawley and will be severely impacted by the construction of cycleways and footpaths, as well as by increased recreational use.  Very high risk of biodiversity net loss.	0
Hyde Hill Woods	LWS	Not yet decided	Should be scoped IN and surveyed as a high priority. It borders a densely built area of the site and will face significant recreational pressure.  Very high risk of biodiversity net loss	0
Ifield Mill Pond	LWS	Not yet decided	Should be scoped IN. An already popular recreational site very close to the site that will definitely be impacted by extra pressure.  High risk of biodiversity net loss.  It is well monitored and recorded with many records in SxBRC (1400) including 20 butterfly species, many plants, breeding birds and winter visitors.	0.12

			Regular surveys are done as part of WeBS <a href="https://app.bto.org/webs-reporting/numbers.jsp?locid=LOC644612">https://app.bto.org/webs-reporting/numbers.jsp?locid=LOC644612</a>	
Wood near Lower Prestwood Farm	LWS	Not yet decided	Should be scoped IN as a high priority. Its public footpaths are already popular due to stunning views, and bluebells in spring. It will face significant recreational pressure. Botanical surveys should be carried out.	0.465
Orltons Copse	LWS	Not yet decided	Should be scoped IN as a high priority. It contains public footpaths and will face significant recreational pressure. Botanical surveys should be carried out.	0.895
Woldhurstlea Wood	LWS	Not yet decided	Should be scoped IN due to increased recreational pressure.	0.94
Ewhurst Wood	LWS	Not yet decided	Should be scoped IN due to increased recreational pressure.	1.3
Kilnwood Copse	LWS	Not yet decided	Should be scoped IN due to increased recreational pressure.	1.3
Buchan Country Park	LWS	Not yet decided	Should be scoped IN due to increased recreational pressure.	1.7
<b>Sites within 5km of site boundary</b>				
Glovers Wood	SSSI	Scoped OUT because risks to air quality are low (6.5.17), and distance from site (7.4.6)	<b>Should be scoped in</b> because it is a key part of the recently discovered very large colony of Bechstein's bats, including the development site and Glover's Wood. See Appendix A.	2.5
Edolph's Copse	LNR	Scoped OUT because of distance from site (7.4.6)	<b>Should be scoped in</b> because it <u>could be</u> important for the recently discovered very large colony of Bechstein's bats.	3.75
Grattons Park	LNR	Scoped OUT because of distance from site (7.4.6)	Agreed	
Tilgate Forest	LNR	Scoped OUT because of	Agreed	

		distance from site (7.4.6)	
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**8. The description of House Copse should give a true impression of its rarity and national importance.**

House Copse SSSI is 'scoped in' but its importance as an SSSI is underplayed (para 7.4.5): '*...is designated for its woodland habitat which is of botanic and historic interest*' – much less description than is given for Buchan Hill Ponds. The Natural England reason<sup>42</sup> for designation of House Copse includes: '...'ancient' woodland with continuity of woodland cover since at least the Middle Ages. This type of woodland cover is rare, being a close association of small-leaved lime and hornbeam, previously managed as coppice, under oak standards, and is almost unknown elsewhere in Southern England'.

Local naturalists can share recent botanical surveys by Sussex Botanical Recording Society.

**9. Willoughby Fields should be surveyed and assessed for impacts on bats, as it is an LNR.**

Willoughby Fields is scoped in, but is listed twice in para 7.4.5 – once as an LNR under Statutory Designated Sites, and again as an LWS under Non-Statutory Designated Sites. It is a Local Nature Reserve, according to Natural England.

**10. All the local woodland and copses with known colonies of Bechstein's bats should be scoped in, ie Glover's Wood, Hyde Hill Woods, Ifield Wood west, and The Mount (maternity roost with 57 bats, at 1km from the site). See Appendix A.**

Glover's Wood SSSI is scoped out 'due to [its] distance from the Site (more than 1.7km)' (para 7.4.5). But paras 7.3.4 – 5 explains that the study area comprises 2km beyond the site boundary, and 5km for bats, so a distance of 1.7km cannot be a reason for scoping out. Also, Natural England's advice is that '*The development Site is within close proximity to Buchan Hill Ponds Sites of Special Scientific Interest (SSSI), Glover's Wood SSSI and House Copse SSSI. The ES should fully consider the potential for any direct and indirect effects to these sites*'.

**11. The EIA should more clearly describe the extent and position of all the undesignated but priority habitat within the study area, and within and adjacent to the site. This includes ancient woodland, hedgerows and shaws, and all other priority woodland. Ifield Wood should be scoped in.**

This area, including the site, contains a large amount of irreplaceable and priority habitat including several areas of ancient woodland. 7.4.5 acknowledges '*There are areas of Ancient Woodland immediately adjacent to the north-western, western, south-western and south-eastern Site boundary*', but this is not expanded on any further.

In particular Ifield Wood – immediately adjacent to the north-western boundary – is not mentioned in relation to habitat and biodiversity, despite containing around 15 ha of ancient woodland plus almost the same again of priority deciduous woodland (from Defra – Magic). The area has a wide range of habitats including ponds, wet and ancient woodland, and veteran trees, but very little recording has been done. .

**12. The habitats and species associated with the River Mole and Ifield Brook are not acknowledged sufficiently in the EIA. They should be subject to separate detailed assessment and discussed in a dedicated section of the EIA.**

The streams of the Upper Mole run through and around the site, and are very important ecological features, particularly in terms of habitat and connectivity. The waterways, riparian zones and surrounding woodland all serve as important corridors, particularly for the Bechstein's bat<sup>43</sup>.

<sup>42</sup> Natural England citation: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002093.pdf>

<sup>43</sup> Bat Conservation Trust: [https://cdn.bats.org.uk/uploads/pdf/Bat-Species-Core-Sustenance-Zones-and-Habitats-for-Biodiversity-Net-Gain.pdf?v=1596874016#:~:text=A%20core%20sustenance%20zone%20\(CSZ,the%20colony%20using%20the%20roost.](https://cdn.bats.org.uk/uploads/pdf/Bat-Species-Core-Sustenance-Zones-and-Habitats-for-Biodiversity-Net-Gain.pdf?v=1596874016#:~:text=A%20core%20sustenance%20zone%20(CSZ,the%20colony%20using%20the%20roost.)

13. **The EIA should also describe how the hedgerows and shaws across the study area been assessed. It cannot be correct that the number of important hedgerows which have been identified decreased between the 2020 and 2023 draft EIAs, from five to the current figure of three (7.4.5).**

The whole area is criss-crossed and surrounded by large hedgerows and shaws many of which can be seen on tithe maps from the 1800s, and are likely to be remnants of ancient woodland – the botanical evidence for which exists from the surveys by local naturalists. These are obviously vital for ecological connectivity, will surely form part of the West Sussex Nature Recovery Network, and should be considered **important** and priority habitat in terms of the EIA.

The 2020 draft EIA identified five important hedgerows (shown on Figure 7.1 of Appendix 7) but the 2023 draft suggests only three important hedgerows are present. What has been the spatial scope of this assessment, and what criteria were used to classify the hedgerows?

Hedgerows surveys by local naturalists suggest that the area has many more important hedgerows than is being suggested in either the 2020 or 2023 EIA drafts.

14. **Rusper Ridge Biodiversity Opportunity Area (BOA) has been omitted from maps and text – this should be corrected, and the impacts of the development on achieving its targets should be scoped in.**

Neither the 2020 or 2023 EIA drafts acknowledge the fact that that Ifield Golf Course falls entirely within the Rusper Ridge BOA, as does most of the future 10,000 site. The Rusper Ridge BOA is mentioned in the list of ‘relevant policy’ but not referred to otherwise. In the same way that *‘the EIA will consider the impacts of the Development upon achieving the targets identified for the Ifield Brook BoA’* (para 7.4.5) it should do the same for the Rusper Ridge BOA.

Maps should be corrected to indicate the Rusper Ridge BOA. For example, Figure 7.1 of Appendix 7 (2020) only included the Ifield Brook BOA.

## Species

### Bats

15. **The draft EIA appears to be downplaying the significant presence of Bechstein’s bat colonies within and around the site. While bats are scoped in, the text should accurately indicate the rarity, status and distribution of this species across the study area (5km for bats), and hence the value of the populations on and around the site, the value of their habitat and the impact of the development.**

Bechstein’s bat expert Martyn Cooke has written *‘From capture surveys we first thought we had around 3 to 4 separate colonies of Bechstein’s within the local area however from radio-tracking we have found this to be incorrect and in fact we have ONE very large colony which extends from the North of Rusper village to the North of Charlwood and eastwards to Ifield and the A264. To date over 15 tree roosts have been located including at least 5 maternity roosts.*

*From emergence counts there are over 200 individual bats, possibly more, within the colony. This makes the colony one, if not the biggest colony found within the UK and is of National and potentially International importance.*

Appendix A contains an extract from Martyn Cooke’s 2022 submission to Horsham District Council includes a map of Core Sustenance Zones for maternity roosts in the area, set at 3km as recommended<sup>44</sup> by the Bat Conservation Trust. This clearly shows that the development site sits pretty centrally in relation to the maternity roosts, and that the roosts are not necessarily located within woodland, as is implied in para 7.4.5: *‘Although individuals are likely to use suitable habitat with the Site (such as tree lines and copses), these are likely to be of lower importance to the local population than surrounding woodland habitats and unlikely to comprise significant portions of the populations’ CSZ, with the Site likely to be at the fringes of the local populations’ home ranges.’* The SxBRC records a maternity roost with 57 individuals counted at The Mount, in a very small copse in pastureland surrounded by hedgerows, shaws and waterways very similar to the development site. Also, the

<sup>44</sup> [https://cdn.bats.org.uk/uploads/pdf/Bat-Species-Core-Sustenance-Zones-and-Habitats-for-Biodiversity-Net-Gain.pdf?v=1596874016#:~:text=A%20core%20sustenance%20zone%20\(CSZ,the%20colony%20using%20the%20roost.](https://cdn.bats.org.uk/uploads/pdf/Bat-Species-Core-Sustenance-Zones-and-Habitats-for-Biodiversity-Net-Gain.pdf?v=1596874016#:~:text=A%20core%20sustenance%20zone%20(CSZ,the%20colony%20using%20the%20roost.)

draft EIA appears to dismiss the 'day roost... at a patch of woodland at the centre of the site' but again the SxBRC suggests that this roost is recorded several times, sometimes with 23, and 25, individuals being counted.

So, it seems as if the importance of the Bechstein's population is being minimised, which is not the case for other groups of species, eg also in 7.4.5: '*The invertebrate assemblage as a whole is considered to be of regional importance*'. Why is similar language not used in relation to the Bechstein's?

Also, para 7.3.4 states: '*The study area is the area within which habitat and targeted species surveys have been undertaken to date but may be extended at a later date for species with a larger range or complex population dynamics (e.g. great crested newt)*'. The Bechstein's bat should be cited as a high priority.

## Birds

### 16. Kingfishers and Red Kites should be scoped in because while they may not be breeding within the site, they are known to be breeding very close by.

There are several records of Kingfishers breeding very close to the development site. The SxBRC report for Ifield Brook BOA includes the following citations:

- a. Ifield Mill Pond LWS: '*The pond is ornithologically important. Great Crested Grebe, Mallard, Moorhen, Coot, Mute Swan and Grey Wagtail breed. Kingfishers are seen regularly and probably breed nearby. It is an important feeding site for House Martins, Swallows and Swifts. During the winter the pond attracts Mallard, Pochard and Tufted Duck. Water Rail have been recorded in winter*'.
- b. Willoughby fields LNR: '*Beautiful Damselflies and Kingfisher breed along the streams*'

Kingfishers occur regularly in the Webs survey records<sup>45</sup>, and in the SxBRC, and so they must be breeding nearby. Local naturalists believe there is one breeding site on the boundary of the development site on the bank of Ifield Brook near The Maples.

Other local reports indicate a high likelihood of breeding pairs of Red Kites in the immediate area.

Although surveys of winter visiting birds have been completed, it's possible that more are needed given that various species arrive and leave at different times, and many surveys will be needed to provide adequate coverage. The monitoring and recording of winter visitors at Ifield Mill Pond LWS should be used a data source.

## Terrestrial Invertebrates

### 17. A factual error should be corrected – Ifield Brook Meadows supports at least 20 species of butterfly, not 6 as stated.

### 18. Given the diversity of species found so far and the fact that '*The invertebrate assemblage in total is considered to be of regional significance*' further surveys should be carried out to assess whether more rare species are present. The fact that Moths, Longhorn beetles and Bees are not mentioned is a concern, and if they have not been surveyed then this should be a priority.

Survey work so far has identified a number of species in the categories of endangered, vulnerable, near threatened, rare and nationally scarce (para 7.4.5). This indicates a high level of biodiversity, which should be fully evaluated both as the baseline for BNG, but also so that suitable mitigation can be put in place should the development go ahead.

## Aquatic Invertebrates and Fish

### 19. Fish should be scoped in, and much more consideration should be given to watercourses more generally.

Fish appear to be scoped out because 'effects on watercourses are considered to be limited'. But this cannot be the case for several reasons:

- a. Changes to the river and wetland dynamics caused by the use of SUDs,

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<sup>45</sup> <https://app.bto.org/webs-reporting/numbers.jsp?locid=LOC644612>

- b. The increased pressure on local waste water treatment works (WWTW) of 3,000 houses, given the current problems with sewage outflows into the Mole, and
- c. The pollution from an additional 4,000+ cars using roads. Research shows that rivers next to roads are contaminated by large particles from tyres and chemicals from engine fluids.

The development will inevitably have a significant effect on the watercourses within the site and on the Mole downstream.

In response to the 2020 draft EIA the Environment Agency (EA) noted ‘a significant lack of consideration with regard to the aquatic environment, predominantly invertebrates, fish and supporting habitat’ (7.2.1). The current draft acknowledges them as sensitive receptors, and does scope in aquatic invertebrates but not fish. The EA suggests their own survey work in the area could be used.

Lastly, within a couple of km downstream both the River Mole and Gatwick Stream have been surveyed and found to be species-rich with regards to fish. So why scope this out when there could be a significant risk to this biodiversity?

- 20. **The decision to scope out Water voles should be revisited, on the basis that they are a protected species, that Natural England specifically mentions them in their 2020 consultation response, and that the species surveys are over five years old and should be repeated.**
- 21. **The section ‘Further Baseline Data to be obtained’ (para 7.4.7) is entirely concerned with whether data are up to date rather than the coverage of baseline data. The EIA should be clear that in order to compile an adequate baseline, more surveys are needed covering specific areas surrounding the development site, as well as targeted-species surveys.**

According to Natural England: ‘The area likely to be affected by the development should be thoroughly surveyed’ (in their response to the scoping request). But as mentioned above the EIA doesn’t provide evidence that any surveying has been done outside the development site itself – in any of the designated sites or priority habitats identified in the 250m buffer zone or the 2km and 5km study areas. If this is the case then as a priority the following should be surveyed: Willoughby Fields LNR, the Ifield Brook Meadows LWS, Hyde Hill Woods LWS and the Ifield Wood ancient and priority woodland.

Also, according to Natural England: ‘ornithological, botanical, and invertebrate surveys should be carried out’. Para 7.4.5 describes surveys of trees (arboricultural) and hedgerows, but there is no evidence that any further botanical surveys have been done or that the hedgerow surveys identified priority species. Assessment of the ecological value of plants across and around the site, and the impact of the development, should be scoped in, or if scoped out then this should be explained.

## Mitigation

- 22. **It is vital that the biodiversity baseline is adequately measured.**

The mitigations as drafted do not seem to take account of the relatively high existing biodiversity, which of course could be found to be much higher if comprehensive surveying was carried out. And as pointed out elsewhere in this response, it seems likely that priority habitats adjacent to the site have not been assessed. In addition to the presence of important species such as the Bechstein’s bat being underplayed. The proposals in the draft EIA for mitigation and for Biodiversity Net Gain (BNG) seem aspirational and high level.

- 23. **Achieving at least 10% BNG will not be as straightforward as suggested in the draft EIA.**

The Horsham Biodiversity Net Gain Assessment 2023 (HDC’s Evidence Base) seems to indicate that it will require significant amounts of money. Also, in its response to the 2020 scoping request, Sussex Wildlife Trust said: ‘We are also concerned about the reality of a true biodiversity net gain when the proximity to Gatwick could restrict the types of habitats that could be created/enhanced.’

Given the lack of detail regarding how BNG might be achieved, do we suppose that the plan is to offset loss west of Crawley in Rusper parish – with gain elsewhere? This would obviously be highly undesirable from the point of view of Rusper and Crawley residents, the local ecosystems and downstream in the Mole valley.

## **APPENDIX A: Extract from submission to Horsham District Council – Martyn Cooke.**

‘From capture surveys we first thought we had around 3 to 4 separate colonies of Bechstein’s within the local area however from radio-tracking we have found this to be incorrect and in fact we have ONE very large colony which extends from the North of Rusper village to the North of Charlwood and eastwards to Ifield and the A264. To date over 15 tree roosts have been located including at least 5 maternity roosts.

From emergence counts there are **over 200 individual bats**, possibly more, within the colony.

**This makes the colony one, if not the biggest colony found within the UK and is of National and potentially International importance.**

The map below shows the positions of known tree roosts used by female Bechstein’s along with the associated CSZ. Roosts used by solitary males are not shown.

The heavy Wealden clay covering most of our area is not favourable for large scale arable agriculture therefore field sizes have remained small. Ancient Hedgerows and mature hedgerow trees, particularly Oaks have remained intact and the area contains numerous small copse which are all well connected. Large amounts of ancient/semi-ancient woodland also survive as do small field ponds. This mosaic of landscape features is crucial for the Bechstein’s to survive and prosper.

In recent years there has been a big outcry at the felling of woodland for development. Although pockets of woodland are left as islands, adjacent habitat including ancient hedgerows and hedgerow trees, which are essential for habitat continuity, are being progressively destroyed. This is causing adverse impact on ecosystem function. The local Bechstein’s bat population needs extensive, landscape scale habitat continuity to survive and any development pressures on this already fragile ecosystem will be deleterious to the long-term survival of this notable population.

Studies have also shown that major roads, such as the proposed **Western Relief Road** have a detrimental effect on bats. This is due to several factors including light, noise and fatalities due to collisions with vehicles. The proposed relief road would effectively cut the known Bechstein’s colony in half. This would severely impact the movement of bats between roosts and thus impact on genetic diversity within the colony and its long-term viability. Favourable foraging habitat would be separated from roost sites and the health and fitness of individuals could be compromised leading to reduced breeding success.’

*Martyn Cooke is a Natural England licenced bat worker holding both Class 3 and Class 4 bat licences.*

*Since 2012 he has organised the Mole Valley Bat Project which mainly focuses on the local Bechstein’s bat population.*

*He is a member of the UK Bechstein’s Bat Study Group and the Mole Valley DC Conservation Group. He is also an active member of both Surrey and Sussex Bat Groups*



