

# Homes England: West of Ifield Planning Application

This submission is written in response to the published documents relating to Planning Application DC/25/1312

## 1. Non-Technical Advice Note

I would first like to comment on the 'Non-Technical Advice Note' which was published by Ramboll UK Ltd, the engineering consultancy overseeing the proposed housing development. The advice note was published within Appendix 8.28 of the Environmental Statement.

In the Introduction, para 1, it states;

*"Ramboll UK Ltd (Ramboll) has subsequently been instructed by the Applicant to provide a non-technical advice note to summarise the work to date, consider potential impacts on the Bechstein bat population, and set out steps that have been taken through the preparation of the hybrid application to mitigate impacts, and identify further opportunities to consider and implement mitigation as the scheme is built out.*

*It is not intended that this note will supersede the future environmental reporting as part of the Environmental Impact Assessment (EIA) accompanying the future planning application, but provide a suitably detailed overview, which supports the EIA Scoping Opinion Request Report (April 2024)".*

The applicant in the above being Homes England (HE). This is the first time I have ever seen an 'Advice Note' of this kind submitted with a planning application, having reviewed planning applications for over 20 years. One can only assume the reason HE requested this 'summary' document was to kindly save the Horsham DC planning officers the trouble of reading through the ACTUAL reports, detailing the findings from the ecological consultancies who carried out the work or was it, as I suspect yet another attempt to downplay the areas importance for bats, in particular Bechstein's bat.

The Chartered Institute of Ecology and Environmental Management (CIEEM) issues guidance on the compiling of ecological reports: Guidelines For Ecological Report Writing, 2<sup>nd</sup> Edition. This contains a comprehensive list of the types of reports which should be submitted and the material to be included. A Non-Technical Advice Note is not listed.

For ecological reports CIEEM is quite explicit that the name of the author and their relevant qualifications, must, be included within the report. This is done for accuracy and integrity of the report and also to show credibility in its findings. The advice note, issued by Ramboll contains nether. Therefore, I would strongly suggest that this document is given little

weight when consideration of the application is made. I would urge the planning officers concentrate on the 'actual' ecological reports rather than developer spin.

## **2. Conservation Status of the Bechstein's bat Colony**

Firstly, there is the matter of whether the bats found within the West of Ifield are numerous small colonies or one larger meta-population.

It has long been established that Bechstein's bats (females) form into discrete colonies, each colony having its own established territory. Radio tracking studies, both in the UK and Europe, have shown that these territories are specific to the colony and bats from adjacent colonies do not mix. Male bats however disperse through the landscape and will overlap with one or more female colonies. Within a colony the bats exhibit what is referred to as fission-fusion, bats join together in social groups before splitting and joining different groups. These groups are not necessarily family members, hence the term 'Social Group'.

Female Bechsteins gather in 'Maternity Roosts' in late May, early June to give birth. These maternity roosts generally comprise of between 20-50 female bats. A single colony therefore would normally have multiple maternity roosts. The reason for multiple roosts is mainly one of space; Bechstein's are cavity dwellers and favour abandoned Woodpecker holes in deciduous trees. The cavity size therefore dictates the number of bats which can be accommodated. Splitting into several smaller groups can be beneficial against predation, for example once an Owl has located a roost they will keep returning. However, if roost features are limited they will use large colony bat boxes such as at Bracket's Coppice in Dorset. I also monitor the only known Bechstein's colony using a building in the UK, where over 100 females gather each year.

In the submission the Bechstein's colony has been described as two populations; north and south, based upon Ifield Wood to the north and the Ifield Golf Course area to the south. However, reading the 3 Bat Capture and Radio-Tracking reports you will see there is evidence to support the claim that these are in fact one large, single, meta-population containing multiple maternity roost sites. Further tracking work undertaken during 2025 has confirmed this.

The International Union for the Conservation of Nature (IUCN) predicts that the species' population at a global level has declined approximately 30% during the past 15 years. Consequently, the IUCN categorises the Bechstein's bats as Near Threatened. Near Threatened describes species that are close to qualifying for or likely to qualify as Vulnerable, Endangered or Critically Endangered in the near future.

The current population of Bechstein's bat in England has been estimated at 21,600 individuals (Natural England, 2023).

A separate assessment (Natural England, 2023) estimated what the favourable population of Bechstein's bats in England should be, given the extent and condition of suitable habitat. Habitat suitability modelling assessed the species' natural range and distribution, the estimated population and the extent and quality of habitat necessary for the long-term

maintenance of the species. The assessment concluded that the favourable population size in England would be 28,000 individuals.

This estimate is approximately 6,400 individuals greater than the current estimated population. Based on a comparison between the current population estimate and the favourable population size, **Bechstein's bat is not in a favourable conservation status**. Favourable conservation status is the situation when the species can be regarded as thriving in England and can be expected to thrive sustainably in the future.

Bechstein's bat is therefore included on the list of habitats and species of principal importance in England. The list enables public bodies to be aware of biodiversity conservation in their area.

Within Volume 1, Main Environmental Statement, Chapter 8: Biodiversity, Table 8-9, there is the Ramboll interpretation of the status of the Bechstein's colony in the West of Ifield area. This table is **totally misleading** in that it **ONLY** refers to the area within the 'red line' boundary of the proposed development. As the numerous maternity roosts were located outside of this line the table states the status is of Regional Importance.

Bats do not respect red-lines drawn on a map, the home range of the entire colony should have been assessed in this table, not just the part contained within the development boundary.

With a estimated population of approx 200, this colony can only be described as of **National Importance**. The claim that there are numerous other colonies within West Sussex is irrelevant, we are talking about the status of the species within the whole of England.

### **3. SAC Status?**

Much has been made of my assertion a few years ago (response to a Ramboll scoping document) that Natural England, should following the letter of the Habitats Directive, make the West of Ifield area an SAC for Bechstein's.

In the 'Advice Note' Ramboll claim "it is considered highly unlikely that Land West of Ifield itself meets the criteria for SAC selection, considering survey results that indicate habitats within the Site are not important for breeding females of any of the surrounding colonies, and that the number of individuals using habitats within the Site does not comprise a significant percentage of the national population (estimated minimum of 10,300 in 2019), this has been used to guide the assessment of importance of the specific population using habitats within the Site".

Once again Ramboll are totally missing the point, this is one large colony split into numerous social groups. The SAC designation would cover the whole of the area, not just the part included within their planning application ie the Site.

As for numbers relating to the percentage of the UK population, these are the population figures for the 3 SAC designated in England for breeding Bechstein's populations.

- Bath and Bradford-on-Avon SAC – minimum 20, maximum 20.
- Bracket's Coppice SAC, Dorset – minimum 51, maximum 100.
- Briddlesford Copses SAC, Isle of Wight - minimum 51, maximum 100.

**Just to reiterate the Ifield population is approx. 200.**

Just to the north of the area is the Mole Gap to Reigate Escarpment SAC. One of the qualifying features for site selection was the presence of Bechstein's. Following years of regular monitoring the area was found to be important for Autumn Swarming and Hibernation. Further to the SAC designation work undertaken during 2024 on behalf of the National Trust confirmed the area is widely used by Male Bechstein's, although the woodland mix is probably sub-optimal. The presence of Bechstein's is repeatedly mentioned in the Mole Valley DC Local Plan.

#### **4. Open Habitat**

Much of the Ramboll argument in favour of the development has focused on the fact that Bechstein's do not use 'Open habitat'. I quote *"There is currently no evidence of use of open habitat areas within the Land West of Ifield Site by Bechstein's"*. Whilst it is undeniably true that the core foraging areas of female, breeding Bechstein's is closed-canopy deciduous woodland, containing a large percentage of Oak. However equally undeniable is that the fact that, particularly in the first capture study where AEWC Ltd were specifically told not to trap in woodland, the majority of the Bechstein's caught were in pockets of trees particularly on Ifield Golf Course. Radio-tracking has shown that these 'open areas' form large parts of the bats home ranges. They are using these tree lined hedgerows to commute from one woodland area to another.

Finally, the advice note delivers this observation; *"Concern has been raised over the proposed development at Land West of Ifield due to its potential importance for the local Bechstein's bat population. However, based on the existing survey data presented within this advice note (which spans a period of 10 years) **this does not particularly support the categorisation of habitats within the Site as "important" for this species**"*.

I find this statement staggering.

#### **5. 3km Core Sustenance Zone**

This has been another contentious issue. 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. With reference to planning and development the core sustenance zone could be used to indicate:

- The area surrounding the roost within which development work can be assumed to impact the commuting and foraging habitat of bats using the roost, in the absence of information on local foraging behaviour. This will highlight the need for species-specific survey techniques where necessary.
- The area within which mitigation measures should ensure no net reduction in the quality and availability of foraging habitat for the colony, in addition to mitigation measures shown to be necessary following ecological survey work.

As can be seen above the area refers to **Commuting and Foraging** areas. As has been documented within the 3 radio-tracking reports the open areas within the 3km CSZs are being extensively used by Bechstein's. There is more work to be done on the use of 'sub-optimal' foraging areas by male Bechstein's. NE and partners are currently undertaking a project looking at this very topic, for which I have supplied data.

The reason the area is so good for Bechstein's are the number of small copse and tree lined hedgerows which allow easy commuting, additional foraging areas and potential roost sites.

## 6. **Crawley Relief Road**

As equally damaging to the Bechstein's colony is the proposal for the Crawley Western Relief road.

Firstly, let there be no doubt that this road is proposed for the full 10,000 house scheme HE have planned, not the 3,000 houses currently the subject of their planning application.

There have been numerous studies which have shown how detrimental wide, multiple carriageway roads are for bat movements. Noise, light and fast moving vehicles provide a barrier to the safe passage of bats from roosts to foraging, swarming and hibernation sites.

The planning department are no doubt aware of NE refusing to issue a licence for the Norwich Western Relief road. This was a proposed 4 mile dual-carriageway which passed close to (ie wasn't within the roads red-line boundary) a nationally important Barbastelle colony. NE decided that the Barbastelle favourable conservation status would be affected by constructing this barrier to the colonies movements.

As far as I can see the only mitigation mentioned within the planning documents to facilitate the free movement for bats is via passage beneath the bridge carrying the proposed road over the River Mole. Despite a search I have been unable to locate a detailed plan for this bridge to comment on its suitability.

This road would severely affect the Ifield Wood maternity roost from accessing woodland to the south and the passage of bats between the maternity roosts in Hyde Hill, Dumbrells Copse and The Mount.

It is also worth noting the proposed dual-carriageway terminates onto a tree lined, country lane (C road) used by both foraging and commuting bats. There are at least 2 known bat roosts in buildings along this country lane.

## 7. Other Bat Species

So far I have only commented on the application regarding one species of bat found on the site, namely Bechstein's bat. However, several other species have been recorded within the area. All UK bat species are classed as Protected Species however note should be taken of 2 in particular.

### Barbastelle

Like Bechstein's this species is listed in Annex 2 of the European Habitats Directive.

Until very recently this species was absent from our area. Odd individuals then started to appear, mainly in agricultural buildings and at our known hibernation sites. It was therefore pleasing and surprising to see that Barbastelle have been caught and subsequently radio-tracked. Whilst initially only Males were caught, which are generally at the front edge of any distribution expansion, in 2025 a female bat was caught. This once again highlights how important this area is for bat conservation.

### Grey Long-eared

This is the **rarest** breeding species of bat within the UK. The entire UK population is estimated to be approx. 1000 bats. Less than a dozen maternity roosts are known of and the only known roost in Sussex is no longer used. The bats almost exclusively use buildings to roost in, many shared with the more widespread and numerous Brown Long-eared.

Firstly, I should say that despite the species being reported as being present in various documents submitted with the application, I am extremely sceptical as to the validity of the records.

However, IF the records are correct, I am totally amazed that this species was not targeted for further work. At the very least all the buildings reported as containing bat roosts, especially those of Long-eared bats, should have had droppings collected and then DNA analysed for the presence of this species. The fact that this was not done highlights the lack of knowledge.

The presence of Grey Long-eared, which are mainly associated with unimproved grassland, would compromise the current mitigation plans for the development site.

Planning officers might be surprised as to why no Grey Long-eared bats were caught as part of the surveys. This is not entirely unexpected as they are notoriously difficult to catch, foraging in mainly open habitats. A study in 2024 in Devon, the UK stronghold of the species, failed to catch any free-flying bats. The only bats caught and radio-tracked were caught inside a known church roost.

I would suggest that the planning department request further information regarding this species from Ramboll and ask why no follow up work was commissioned.

## 8. Conclusion

The proposed 3,000 house development within Phase 1 of the larger 10,000 house scheme and the proposed Western Relief road will **detrimentially affect the Favourable Conservation Status of a Nationally important Bechstein's bat colony** found within the area west of Ifield.

**This planning application should be refused and before re-submitting the Horsham District Local Plan for approval, the area should be removed as a location suitable for development.**

## 9. Author

[REDACTED]

I have been a NE licenced bat worker for over 20 years. I currently hold a NE Class 3 and Class 4 bat licence.

I have been running the Mole Valley Bat Project since 2012 specifically looking at our local Bechstein's bat populations. I regularly undertake survey work in our local area for the National Trust, Woodland Trust and Gatwick Airport Ltd. This work carried out under a NE Bat Project Licence held and renewed since 2012.

I was a member of the UK Bechstein's bat Study Group before this folded in 2019, but shortly to reform under the auspices of the Vincent Wildlife Trust.

I was a member of the Mole Valley DC Conservation Group until it was closed by the council in 2024. One of our main tasks was to view and comment on planning applications however since 2024 the council have employed their own in-house ecologist.

I have been an active member of both Surrey and Sussex bat groups for over 20 years.

I run an ecology company specialising in bat acoustics and currently work under contract from the Bat Conservation Trust.