

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

Prepared [REDACTED] on behalf of the Save West of Ifield campaign group.

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 basis¹. 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.**

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

¹ 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>

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 advice², 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.**

² https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=AA0477E418F011EB8F1058FB8467EA8B

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.

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 reports³ 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'***

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.**

³ <https://www.gatwickairport.com/company/sustainability/biodiversity.html>

⁴ 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>

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 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)
Sites within 2km of site boundary				
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 'based on the potential for adverse effects as a result of increased recreational pressure' (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.	0

			Very high risk of biodiversity net loss.	
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. Regular surveys are done as part of WeBS https://app.bto.org/webs-reporting/numbers.jsp?locid=LOC644612	0.12
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
Sites within 5km of site boundary				
Glovers Wood	SSSI	Scoped OUT because risks to air quality are low (6.5.17), and	Should be scoped in 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

		distance from site (7.4.6)		
Edolph's Copse	LNR	Scoped OUT because of distance from site (7.4.6)	Should be scoped in 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 distance from site (7.4.6)	Agreed	

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 reason⁵ 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'*.

⁵ Natural England citation: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002093.pdf>

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 bat⁶.

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

⁶ 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.)

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 recommended⁷ 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 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'*

⁷ [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.)

Kingfishers occur regularly in the Webs survey records⁸, 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 as 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,
- 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.**

⁸ <https://app.bto.org/webs-reporting/numbers.jsp?locid=LOC644612>

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 Ruspur parish – with gain elsewhere? This would obviously be highly undesirable from the point of view of Ruspur 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

