Contact: Helen Davies
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Date: 1 October 25

By email only
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Dear Jason Hawkes

Planning Application Reference: DC/25/1312
Description: Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition.
Location: Land west of Ifield, Crawley.

The following comments, related to biodiversity matters, are made on behalf of the Sussex Wildlife Trust. The Trust supports the plan-led process and recognises that this a promoted strategic site. However, during consultations on the local plan we highlighted our concerns about the District's ability to absorb a development of this size whilst ensuring the District's natural capital and Nature Recovery Network are not compromised, especially when considered in combination with the other proposed major developments within the District and in neighbouring Crawley. It is imperative that sites coming forward do not lead to the deterioration or direct loss of biodiversity, especially designated sites, irreplaceable habitats, priority habitats and priority species.

Sussex Wildlife Trust **objects in principle** to this application, which proposes to develop a large green-field site supporting numerous recognised wildlife sites and natural capital assets, such as wetlands and ancient woodlands.

The Trust is particularly concerned at the direct loss of important wildlife sites such as part of the River Mole but also the indirect effects of intensified recreation and human disturbance on sensitive habitats and species, and the impact on the District's wider ecological network.

We remind Horsham District Council of the commitments they have made to the natural environment within the Horsham District Planning Framework. The Sussex Wildlife Trust is concerned that the application is not consistent with the following planning policies:

Policy 25 - The Natural Environment and Landscape Character
Policy 26 – Countryside protection
Policy 31 - Green Infrastructure and Biodiversity

Policy 33 - Development Principles
Policy 35 - Climate Change
Policy 38- Flooding

Designated sites

The proposed development area contains, borders and lies in close proximity to the following designated wildlife sites.

The Ifield Brook Biodiversity Opportunity Area (identified by The Sussex Biodiversity Partnership), which contains:

- **Ifield Brook wood and meadows Local Wildlife Site (SNCI)** which is made up of 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.
- **Ifield Pond Local Wildlife Site (SNCI)** which 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.
- **Willoughby Fields Local Wildlife Site (SNCI)** - a large site containing unimproved grassland with wet flushes and a network of hedgerows and small copses of relict ancient woodland with species such as Ramsons and Moschatel.

Also relevant is The Rusper Ridge Biodiversity Opportunity area, which includes:

- **House Copse SSSI -** a small, isolated semi-natural woodland of Small-leaved Lime and Hornbeam, previously managed as coppice under Oak standards, and is almost unknown elsewhere in southern England.
- **Warnham SSSI** - a brick pit which exposes the lower Weald Clay Group above the Horsham Stone.
- **Brookhurst Wood and Gill, and Morris's Wood Local Wildlife Site (SNCI)** is Hornbeam-dominated woodland situated predominantly on or adjacent to stream valley sites. There is a rich ground flora in places, with a good variety of mosses and liverworts, and number of butterflies using the woodland rides.

Bordering the south of the proposed development area is **Hyde Hill Local Wildlife Site (SNCI)**, which has a diversity of habitats including semi-natural woodland, hedgerows, streams and grassland. There are a number of uncommon species including Wild Service Tree, Midland Hawthorn and Violet Helleborine. The site is also important for butterflies with 26 species recorded including White Admiral. Several bat roosts have been identified within Hyde Hill Wood including a maternity roost for rare Bechstein's bats[1].

Kilnwood Copse Local Wildlife Site (SNCI) is an Oak and Hornbeam woodland of variable structure, with Small-leaved Lime distributed throughout. There is a variety of mosses and liverworts, and two small ponds although there are a number of non-native species surrounding these.

Local Wildlife Sites (LWS, formerly known as SNCIs) are identified and selected locally using robust, scientifically determined criteria and detailed ecological surveys. With significant local, regional and national wildlife value,

[1] HDC-Ecology-comments.pdf paragraph 2

LWS are critical components of the District's ecological network and must be given due consideration in the planning process.

It is our view that adequate mitigation and compensation has not been provided, and the reasons for development cannot be considered to be wholly exceptional given that there are other sites available. As such, Paragraph 193 of the National Planning Policy Framework (NPPF) is clear that permission should be refused.

Overview

The area is important for bats, with 17 bat species identified within 5 km of the proposed development site. This includes a maternity roost for the highly protected Habitats Directive Annex II Species Bechstein's bat, one of the UK's rarest mammals, recorded from only a small number of sites in southern England and Wales, with very few maternity sites currently known. Pre-commencement surveys will be required as bats may be occupying the buildings on site.

Ditches, hedgerows, ancient woodlands, watercourses, ponds and transitional habitats fringing the main rivers provide a relatively undisturbed, connected mosaic of valuable wildlife corridors which support a wide variety of BAP species. Although new ditches and hedgerows will be created and existing ones enhanced, overall, there will be a net loss of these important linear features.

The proposed development will also result in the loss of 90 hectares of farmland and is likely to impact negatively farmland birds which have experienced catastrophic declines in recent years. Hobby and Barn Owl have also been recorded using the area.

Fragmenting and enclosing these habitats with housing and commercial development will have a deleterious effect on their wildlife value, which will be impossible to mitigate and compensate for entirely within the current proposals. Even less so with further phases of development and a two-year delay in the provision of BNG measures.

These impacts will occur directly through habitat loss and disturbance during the construction period and subsequently as the residential population increases. This includes the proposed pedestrian cycle link which will run across the southern part of the meadow at Ifield and Brookwood Meadows LWS. Pets and increased human disturbance to nearby wildlife sites will not be mitigated by the proposed measures, especially along the Ifield Brook where Kingfisher and Nightingale have been recorded, and the Hyde Hill Woods which contain a number of Bechstein's bat roosts and rare plants (see description above). We note that some provision for informal access and exercise has been included in the proposals but the only way to ensure the safeguarding of sensitive sites in this context is to have wardens on site to raise aware ness and police antisocial behaviour. However, this may not be sustainable in the long term.

The 15m buffer around Ancient Woodland is a standard minimum requirement and does not represent any additionality as described by the Applicants. Proposed 5m buffers should be extended to 15m as a minimum and veteran trees should not be felled or damaged. It is not clear why 5m scrub buffers are considered to reduce impacts to bats, which are primarily affected by light and habitat loss/fragmentation.

Flood risk and wetland habitats

The Trust notes that much of the site is floodplain categorised as flood risk 1, 2 and 3 (the highest risk category) because of the proximity of the River Mole, Ifield Brook and Balhorn's Brook, the river floodplain and associated ditches, drains, ponds, wet flushes and wet grassland. It should be considered as having significant flood storage/alleviation capacity under current land uses. Furthermore, The Southeast Rivers Trust have described the River Mole as 'flashy' and as having a 'high catchment responsiveness to rainfall'. [2] As such, we suggest that as this is land that is potentially required for current or future flood management, it should be safeguarded from development (NPPF Paragraph 172).

The underlying geology of the area made up of the Weald Clay Formation (mudstone)[3] - has low porosity and is easily compacted, which renders it prone to flooding. This will be exacerbated by climate change-induced changes to rainfall patterns, resulting in increased periods of drought interspersed with bursts of heavy rainfall. The Trust is concerned that in an attempt to moderate the effect of these extremes, existing watercourses and natural flood storage areas (wetlands) will be modified and re-engineered in a planned (or emergency) manner, which will lead to further damage and habitat loss. The Trust is concerned that mitigation measures designed to protect nature may be put at risk in the longer term by flooding elsewhere on the site.

The Trust is also concerned that the inherent flood risk of this site is not being adequately considered due to national housing pressures and land supply issues. The Trust considers that the Sequential Test should be applied in the light of the updated Flood Risk and Coastal Change PPG September 2025 and that risks from all types of flooding are considered in the relevant assessments.

Runoff from commercial areas, roads and driveways will put water-dependant habitats and species at further risk from pollution, especially within the River Mole and Hyde Hill Brook, into which it is proposed that a number of drainage outfalls will flow. Eleven outfalls in total will be constructed to allow water to drain into existing watercourses and ditches. The siting of a major roadway through a functioning flood plain (flood risk 3b) not only prevents the flood plain from functioning in a natural way as it does currently, but it will also destroy rare transitional flood pasture and fringing woodland habitats, which are highly sensitive.

A further impact needs to be considered during construction, if surface flows from heavy rainfall need to be temporarily diverted, this could deprive dependant habitats further afield, causing them to dry out during the summer. The impact of the compensation flood storage on existing hydrological features requires further investigation.

Water neutrality

The applicant has submitted that it may be possible for water supply requirements to be provided from groundwater under the proposed development site using boreholes, capable of sustaining an uninterrupted (i.e., through dry summer periods) supply of approximately 500 m3/day. However, the continued supply and quality (due to elevated chloride levels) of the water from this source has been questioned. Furthermore, the source of the recharge of this 'fossilised groundwater' supply (suggested by high fluoride levels), in the deep and confined aquifer, is also unclear.

[2] https://www.southeastriverstrust.org/projects/gatwick-airport-nfm/
[3] April 2024. Doc Ref. WSP-WATER-REPORT-INT-000

The WSP report April 2024 (op.cit) also describes risks from abstraction which could result in changes to groundwater levels and hydrogeological flow regimes. This could affect habitats that are groundwater dependent, such as species-rich wet grassland. Surface water features such as ponds that receive baseflow from groundwater could also be adversely affected.

BNG

The wetland habitats listed in Appendix 2 have been inadequately surveyed so the descriptions and assessments of habitat quality cannot be relied on. The Sussex Biodiversity Partnership descriptions have been included in this response as a more reliable indicator of habitat quality. Sussex Wildlife Trust supports the comments made by the Environment Agency in relation to BNG, in which they outlined a number of incorrect assessments and calculations and the incorrect application of the BNG metric.

The Trust accepts that a number of areas may benefit from positive management as identified by the Biodiversity Opportunity Areas but this will require specialist long term site management to counter the negative effects of the proposed development and may not be sustainable in the long term.

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 and/or enhanced.

We refer also to the comments SWT made in relation to the Crawley Local Plan regulation 19 consultation (submission version) on 20th June 2023, copied below:

Section 17 Sustainable Transport
Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link

SWT notes that this policy has changed its name since the last Regulation 19 Consultation, when it was referred to as ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road. Despite the name change, SWT sees that the area search still includes areas of known biodiversity value including a Local Wildlife Site and ancient woodland.
We acknowledge that the supporting text (17.24) states:
New highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space would be wholly unacceptable, given the impact this would have on ancient woodland, the biodiversity in the LWS and LNR, the character of Ifield Village Conservation Area, the flood plain
and the recreational use of the Local Green Space.
SWT is concerned that this commitment is not translated into the policy wording. We propose an amendment to the policy wording, ST4, bullet point (a):
The design and route of the Western Multi-Modal Transport Link must take account of:
a. its impact on (but not limited to):
- *existing properties which could be affected by the final route;*
- *residential and commercial properties close to the final route;*
- *the flood plain;*
- *the rural landscape;*
- *local biodiversity* **& protected sites***;*
- *sports pitch provision and recreation facilities; and*
- *heritage and heritage landscape assets and visual intrusion.*

This would support consistency with policy GI2 and NPPF2021; Para 174, 179 & 180.

Thank you for your consideration of these important matters.

Yours sincerely

Helen Davies
Conservation officer