

Rye House
Hollands Lane
Henfield
West Sussex
BN5 9QY

PLEASE reference this letter on the website as: 'RYE HOUSE 4 - ECOLOGY'

Ms. Amanda Wilkes, Planning Officer
Horsham District Council
Park North
North Street
Horsham
West Sussex
RH12 1RL

5th June 2023

Dear Ms. Wilkes

Re: Sandgate Nursery, West End Lane, Henfield, West Sussex BN5 9RD
Reference DC/23/0189
Outline application for erection of a continuing care retirement community of up to 72 units of accommodation (Use Class C2) and up to 10 starter homes (Use Class C3) with associated community facilities including medical centre and on-site laundry and catering facilities, with access, infrastructure, open space, landscaping and associated works (all matters reserved except for access).

We write as owner and occupier of Rye House, Hollands Lane, a 9 acre property directly adjacent to the Sandgate site and separated only by the unmade-up section of Hollands Lane, some 50 yards west of the junction with Hollands Road. The proposed development site is less than 20 feet from our boundary.

We strongly oppose this application on the following grounds, or with the following comments.

Local and Government Wildlife Strategy

Localism in action is well evinced by the HDC 'Wilder Horsham' strategy and this site is identified as part of a 'Nature Recovery Network'. It is also a valuable link for wildlife between the Downslink section south of Hollands lane and the section running north from behind the Cat & Canary / Bishop Park estate on West End lane. This site is a valuable wildlife corridor

As to central government, the strategy is clear and it is to ENHANCE biodiversity. Outcome 3 of the Government's Biodiversity 2020 strategy contains an ambition to ensure that:

'By 2020, we will see an overall improvement in the status of our wildlife and will have prevented further human-induced extinctions of known threatened species.'

The urbanization of the site would both destroy the locally developed plans to enhance biodiversity and flout the government's intentions. The proposal defies any concept of enhancement. It is equally simple common sense that there are no 'mitigation strategies' than could possibly compensate.

Wildlife and Habitat Survey

The site has been unmanaged for in excess of 30 years, certainly since before 1992, and the profusion of wildlife is now extraordinary and cannot be said to be of low nature conservation importance. As a result, the site has become and is now functioning as a wildlife sanctuary.

We will refer to The Ecology Partnership reports, principally their Preliminary Ecological Assessment (PEA) and the Ecological Impact Assessment (EIA)

1)

2) Birds

There is a local nightingale that can be heard again this year at Rye House and in Hollands Lane but we are unclear as to the nesting site. We are regularly delighted to see and hear owls flying across Rye House land and the neighboring Sandgate site. Cuckoos were heard on the site this spring.

3) Deer

We regularly see deer on Rye House land and also on the Nursery site, as have walkers who have commented to us in the past on the pleasure received in sighting these shy animals. We note that they are not mentioned in either report

4) Birds of prey

Often seen circling a site which provides for them a rich hunting ground.
Note also the owls comment above.

5) Bats

Over the years, we have had regular sightings of bats over Rye House land, and equally over the Nursery site. As yet, we are not aware of a nesting site in the vicinity but there must be one. We note the Bat Survey Report lists numerous bat overflights of the site but concludes (PEA sect 3.14) *“the site is considered to have moderate potential for commuting and foraging bats”*. This would seem counter intuitive as it would seem to be an ideal nesting site for these precious creatures and major construction on this site cannot but seriously affect this delicate and endangered species.

6) Bats and lighting

We quote from EIA sect 5

- 5.8 A sensitive lighting scheme should be implemented to reduce the impact of any artificial lighting on bat commuting and foraging habitat as recommended within the Bat Activity report (The Ecology Partnership 2022b).
- 5.9 Even if a sensitive lighting strategy is enacted, and highest value commuting features retained, it is considered that extensive loss of habitat across the majority of the site would still result in a **minor negative effect** for foraging and commuting bats, and further compensation will be required. If a sensitive lighting strategy is enacted, and highest value commuting features retained, it is considered that extensive loss of habitat across the majority of the site would still result in a **minor negative effect** for foraging and commuting bats.

This is palpable nonsense. House lights, street lights, car headlights, traffic noise etc, etc, would certainly drive these animals away from the area and potential nesting sites, either on the site itself or on adjacent sites. There is no 'sensitive lighting scheme' that would mitigate the effect of turning a wild field site into an urban environment.

Additionally,

the site hosts bees, butterflies, all sorts of insects and a proliferation of wild flora.

Redactions on species lists

We note that there are extensive redactions in EIA. These are all concerning species lists.

We do not understand if these omissions are as presented by The Ecology Partnership or as redacted by the HDC. However, we note them here as requiring explanation.

Clause or page refs: 3.14, p21 table 5,5.2, 5.13, 10.2, table on p35.

Deciduous woodland

PEA p9 sect 3.4 shows the deciduous woodland on the neighbouring property, at the south west corner of the site and shows that woodland as NOT extending into the site itself.

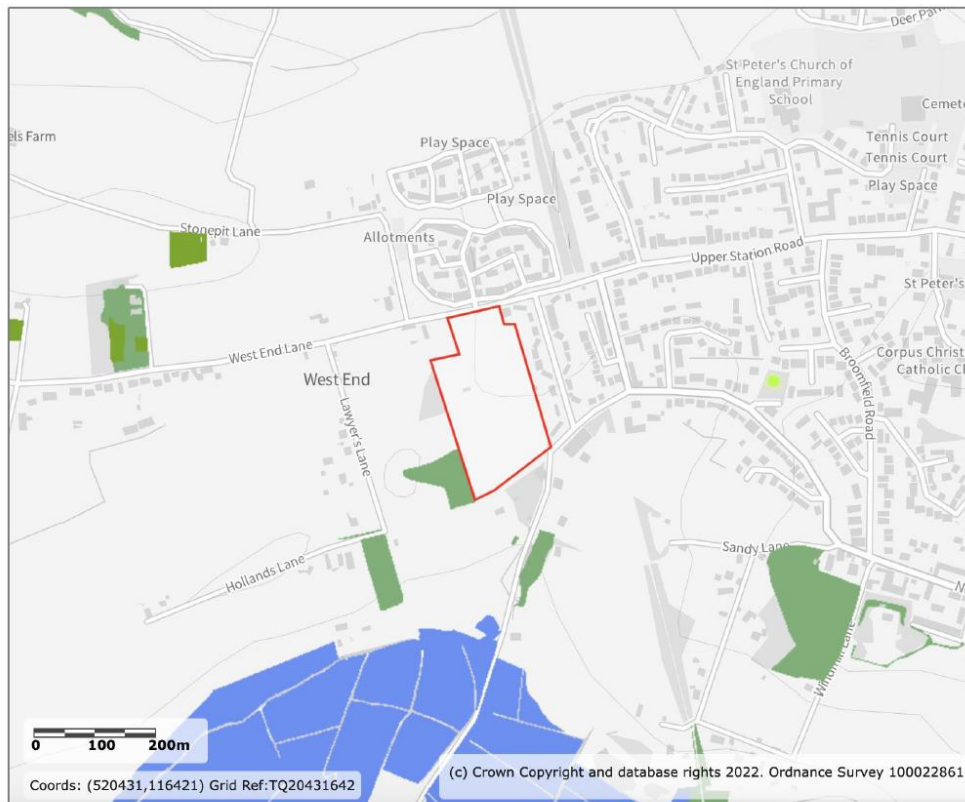


Figure 3: Priority habitats within local area: Deciduous Woodland (dull green), traditional orchard (lime green) and floodplain grazing marsh (blue), priority pond (bright green).

This is not an accurate reflection of the actuality. That woodland now extends by a considerable margin into the southwest corner of the site. This is confirmed by the applicant's own reports: PEA p31 and EIA p17, table 5, fig 4, which shows this woodland in pale green

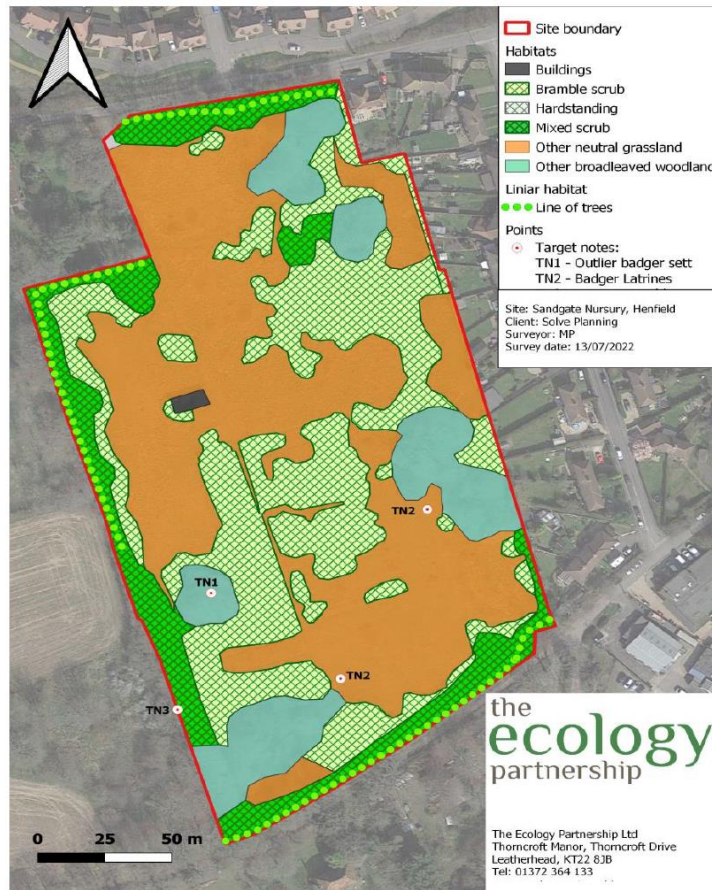


Figure 4. Habitat map for the site.

We consider a brief one day inspection by consultants, not independent of the applicant, to be unacceptable and the council, in order to truly represent the desires of the community, should employ an independent consultant prior to considering this application. This wildlife haven should be protected and preserved.

Yours sincerely