

[REDACTED]

Sent: 11 June 2026 14:54
To: Planning
Subject: Serious Concerns about the validity of an Ecological Survey and BNG calculations DC/25/2114

Categories: Comments Received

Serious Concerns about the validity of an Ecological Survey and BNG calculations

Dear Mr Holmes

This letter is an addition to the letter that I send yesterday 10th June

I wish to draw your attention to the fact that a tractor-mounted flail mower was used to clear the field on 4th August 2025.

A flail mower as I'm sure you are fully aware is a substantial agricultural and land-management implement powered by a tractor's Power Take-Off (PTO) system. It consists of a rotating drum fitted with multiple heavy-duty flails or blades that cut, shred and mulch vegetation. Such machines are commonly used for the management of tall grass, dense weeds, brambles, scrub, rough vegetation and overgrown areas where conventional mowing equipment would be unsuitable or ineffective.

The purpose of a flail mower is to tackle substantial vegetation growth and to reduce dense vegetation to a manageable condition. Due to the cost of operating both the tractor and the flail attachment, together with the nature of the equipment itself, it is generally used where there is a significant volume of vegetation requiring clearance.

I point out again that the Eco Co-op report describes the condition of the field as '**remaining scrub**', However, the use of a tractor-mounted flail mower on 4th August 2025 appears inconsistent with the suggestion that only limited or residual scrub was present. In practical agricultural and land-management terms, it would be unusual to deploy such equipment solely to clear sparse remnants of scrub or minimal vegetation.

Importantly, Eco Co-op's own report acknowledges that the field was flailed. In my view, this acknowledgement raises further questions regarding the description of the site as merely 'remaining scrub'.

Between October 2021 and August 2025, the field was not managed, mown or cut and was left to regenerate naturally. Given that the site had experienced almost four years of uninterrupted growth, it is difficult to reconcile the description of the field as merely "remaining scrub" with the substantial vegetation and habitat that would reasonably be expected to have been present prior to the flailing undertaken on 4th August 2025.

I respectfully ask the Council to take this matter into account when assessing the accuracy of the description contained within the Eco Co-op report and the condition of the field as it existed immediately prior to the clearance works undertaken on 4th August 2025.

Furthermore, the ecological importance of scrub habitat should not be underestimated. The Wildlife Trusts describe scrub as being "very valuable for a wide range of wildlife", providing food sources, shelter, breeding sites and protection for numerous species. They also note that dense bramble scrub provides "valuable protection for nesting birds and good habitat for a range of other small animals".

Given these recognised ecological benefits, I find it difficult to understand how Eco Co-op could carry out a wildlife survey only one week after extensive flailing had taken place across the site. The scale of the clearance was shocking to witness, particularly in light of the previous instructions given by Eco Co-op..... ***"It is important that no habitat clearance or other site preparation work should be undertaken until planning permission has been granted and all relevant protections for habitats of importance and protected species have been detailed and implemented. Please be advised that any work to remove or modify habitats outside of typical management may undermine a future planning application."***

I therefore respectfully ask Horsham District Council whether Eco Co-op can genuinely be satisfied that a meaningful assessment of the site's ecological value could be undertaken so shortly after such extensive vegetation clearance. It appears to me that the timing of the survey raises serious questions as to whether the true extent of the wildlife, habitat and ecological importance present before the flailing was capable of being properly recorded.

I find it particularly difficult to understand how an ecological consultant could visit the site only one week after such extensive clearance and not recognise the extent to which the habitat had been altered immediately prior to the survey work being undertaken. The condition of the field following the flailing was, in my view, both extensive and visually obvious. This raises legitimate concerns as to whether the ecological surveys were capable of accurately reflecting the site's pre-clearance condition, including its value as habitat and foraging grounds for bats, reptiles, birds, invertebrates and other wildlife species.

I also understand that Place Services has reached its conclusions based, at least in part, on information provided by Eco Co-op. However, having reviewed the report and compared it with my own observations of the site, I am concerned that a number of apparent inaccuracies and inconsistencies have not been adequately explained. I therefore respectfully request that the Council carefully scrutinise the information supplied by Eco Co-op and seek clarification where necessary before placing significant reliance upon its conclusions.

I would be grateful if these concerns could be fully addressed as part of the Council's consideration of this matter and if a detailed explanation could be provided regarding the methodology, timing and reliability of the ecological survey undertaken following the flailing of the site.

Given the acknowledged flailing of the site immediately before the ecological survey, I respectfully request that the Council require Eco Co-op to provide full details of the methodology used to determine the biodiversity baseline, including any pre-clearance habitat data, aerial photography, site photographs, historical ecological records, habitat condition assessments and justification for the UKHab classifications and condition scores applied within the Biodiversity Metric. Without such information, it is difficult to understand how the Council can be satisfied that the survey and associated BNG calculations accurately represent the ecological value of the site before the vegetation clearance took place.

Below are photos taken by The Eco Co Op of the site during their survey and posted on the HDC portal as Interim Ecological Report on 17/12/2025

I personally find it hard to contemplate any ecological survey.....

Flora and fauna

Insect populations specifically moths for bat for important bat species

Reptiles

Birds

Biodiversity net gain calculations

...to be carried out on this moonscape.

Yours faithfully

[Redacted Signature]

Oxcroft
Church Farm Walk



Photograph 1. View across the northern section of the site.



Photograph 2. Blackthorn scrub to the northeastern boundary of the site.



Photograph 3. View from the southern boundary



Photograph 4. View from the northern boundary looking