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Sent: 08 June 2026 09:02
To: Planning
Subject: Attention Daniel HolmesDC/25/2114
Categories: Comments Received

Concerns of Ecological Contrasting Perspectives

Dear Mr Holmes

I am writing to seek clarification regarding the ecological information submitted in support of this application and, in particular, the differing conclusions reached by Place Services between 2022 and 2026.

In its consultation response dated July **2022**, Place Services stated:

*“We are **not** satisfied that there is sufficient ecological information for determination.”*

The letter further noted that the Interim Ecological Assessment (The Ecology Co-op, March 2022) recommended additional reptile presence/likely absence surveys because the site contained suitable reptile habitat, and that a reptile mitigation strategy might be required.

In contrast, Place Services’ consultation response dated February **2026** states:

*“We **are** satisfied that there is sufficient ecological information available to support determination of this application.”*

With the greatest respect, I would welcome an explanation as to why Place Services considered the ecological information insufficient for determination in 2022, yet concluded in 2026 that sufficient ecological information was available to support

determination. This is particularly difficult to understand given that Place Services also indicated that some ecological information of **2022** had been redacted

My concern is heightened by the timing of the reptile surveys undertaken by The Ecology Co-op.

The **2022** reptile surveys were conducted between 6 July and 26 September **2022**, which falls within the recognised survey season and is generally considered an appropriate period for reptile surveying.

However, the **2025** reptile surveys were conducted between 24 September and 17 October **2025**, a significantly less reliable period due to declining reptile activity and weather conditions. Given this, it is difficult to understand how the later surveys could provide a stronger evidential basis than those undertaken during the more suitable survey window in 2022.

I am also concerned by a statement referred to by Place Services in its February 2026 response:

“We understand from the Ecology Letter (The Ecology Co-op, December 2025) that dense bramble scrub had been removed between the two visits to the site in 2021 and that the remaining scrub had been recently flailed before the update walkover survey in August 2025.”

I consider the description of the habitat as “the remaining scrub” to be highly misleading.

Having lived adjacent to the field for the past ten years, I can state that between 2021 and 2025 the vegetation had fully regenerated and grown to chest height across much of the site. Following four years of uninterrupted growth, the habitat could not reasonably be described simply as “remaining scrub.”

The site had developed into a dense bramble habitat of significant ecological value. Such habitats are recognised by wildlife organisations as important wildlife-rich environments, commonly found on scrubland, woodland edges and hedgerows. Their dense and thorny structure provides valuable shelter, nesting opportunities and foraging habitat for a wide range of species.

I am also concerned by Place Services’ comments regarding bats. The February 2026 response states:

‘As neither of these (felled trees) would contain Potential Roost Features for bats, we agree that no further surveys for bats are required.’

While this statement refers specifically to two previously felled trees, it appears to overlook the presence of several mature trees surrounding the proposed development site. These trees possess characteristics such as age, fissured bark and other features that could potentially support bat roosts.

Of particular concern is the presence of Barbastelle bats along with 8 other species which have been recorded at this site. Although previous surveys concluded that the Barbastelle bats may have been commuting through the area, it seems equally plausible that they were utilising the site for foraging. Prior to the extensive flailing and clearance of vegetation, the site provided habitat that could have supported feeding opportunities for this rare species.

Furthermore, I note that The Ecology Co-op's bat survey work was undertaken in **October 2025**, outside the principal survey period recommended by the Bat Conservation Trust. I also understand that The Ecology Co-op's assessment relied, at least in part, on survey information gathered in 2022, despite statements within the submitted documentation indicating that elements of those earlier survey records had been lost.

Given these issues, I would be grateful if the Council could explain:

1. Why Place Services considered the ecological information insufficient for determination in 2022 but sufficient in 2026.
2. What weight was given to the timing and reliability of the 2025 reptile surveys when compared with those undertaken in 2022.
3. Whether the description of the site's habitat as "remaining scrub" accurately reflects the condition of the site immediately prior to clearance in 2025.
4. Whether adequate consideration has been given to the mature trees surrounding the site and their potential value to bats.
5. Whether the timing of the October 2025 bat survey is considered compliant with recognised best-practice guidance.
6. How reliance can be placed upon earlier survey information if, as indicated within the submitted documents, some of the original survey data had been lost.

Taken together, these factors lead me to conclude that the ecological evidence available in 2025 was, if anything, less comprehensive and less reliable than that available in 2022. The 2022 surveys were undertaken during a more appropriate survey season and before the subsequent clearance and flailing of habitat. By contrast, the 2025 surveys were undertaken later in the year, after significant habitat alteration as was the 2021 flailing ...had occurred, and appear to rely in part upon earlier survey information that is no longer fully available. It is therefore difficult to understand how Place Services could conclude in 2026 that there was sufficient ecological information to support determination when, in 2022, they considered the available evidence insufficient

Writing this letter has allowed me to express concerns that I believe deserve careful consideration.

Yours faithfully



Oxcroft

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