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4th June 2026

Ref: DC/25/2114 – Ecology Addendum

Dear Mr Holmes,

I write further to recent points raised on Application DC/25/2114 for land at Church Farm. Where possible, I have responded to the points raised by Horsham DC on this application relating to bats, breeding birds, [REDACTED] and impacts to the River Adur Water Meadows & Wyckham Wood Local Wildlife Site.

Bats

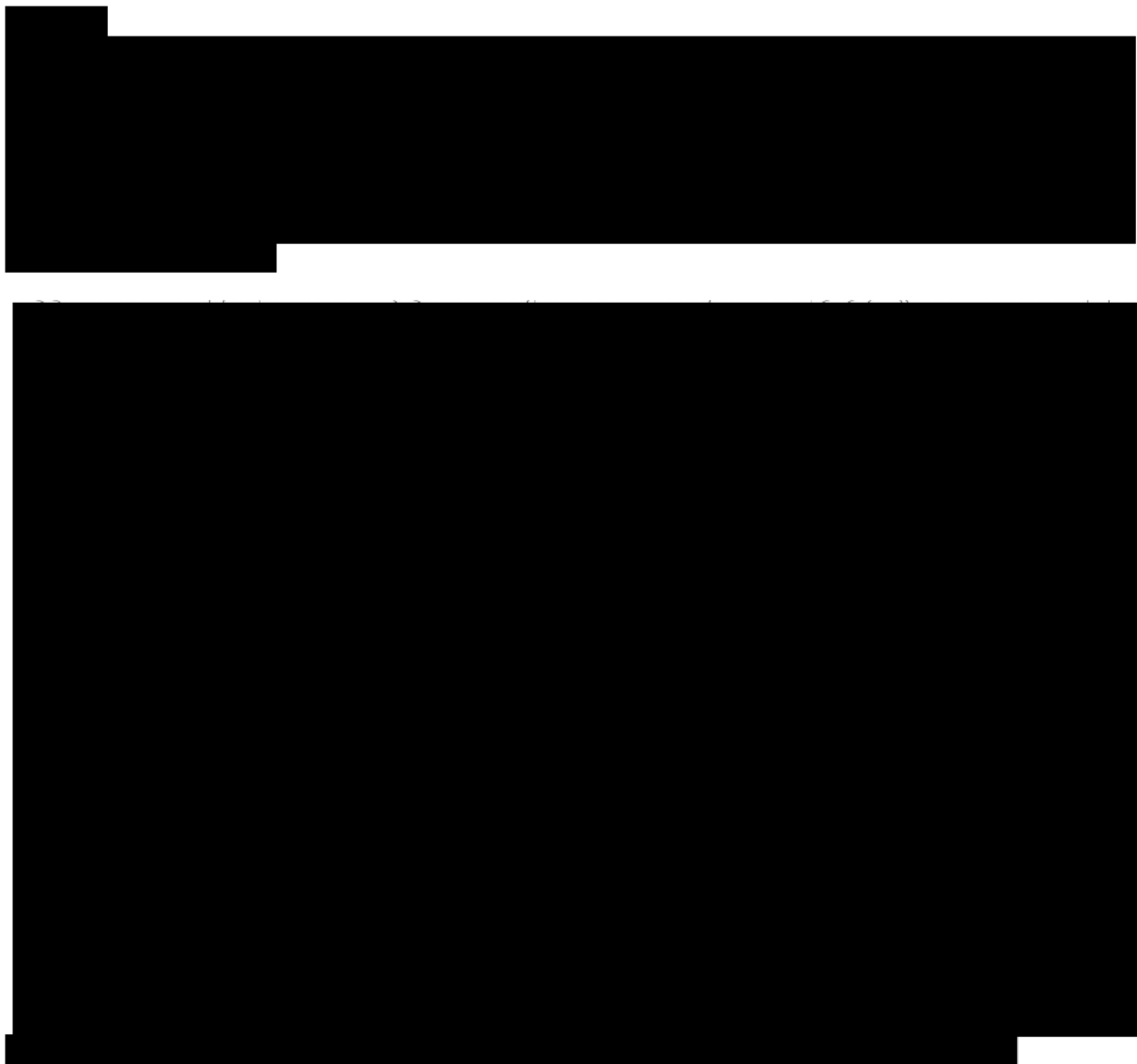
Barbastelle bats were detected in very low numbers at the site, with data in the EclA identifying a mean average of 8 passes detected per night. The potential for barbastelle bat roosts to be present is negligible and this is a very wide ranging species, which utilises a range of habitats, but does regularly make use of riparian corridors. The proposed sensitive lighting strategy as set out in the EclA is appropriate given these findings, the scale of the development and the capacity for appropriate mitigation and compensation measures as set out in sections 5.3.2 and 5.3.4 of the EclA.

Breeding Birds

During a site inspection undertaken on the 4th June 2026, Cetti's warbler *Cettia cetti* and reed warbler *Acrocephalus scirpaceus* were both recorded in off-site locations at a wet ditch approximately 100m to the northwest of the site. This is a typical habitat for these birds, which nest close to riparian corridors, lakes and ponds, with Cetti's warbler preferring scrub habitat adjacent to waterbodies and reed warbler preferring stands of common reed. Since Cetti's warbler was first recorded breeding in the UK in the 1970s, their populations have risen to more than 2000 territories, with strong populations in the southeast.

Cetti's warbler is a Schedule 1 species, meaning that it is an offence to disturb these birds whilst building a nest, or if it is on or near a nest containing eggs or young. It is also an offence to disturb the dependent young of such a bird.

The proposed development site is situated some distance from the riparian corridor and the ruderal and bramble scrub habitat forming the main body of the site in this location would not be considered typical habitat. As best practice, the work to develop this site would have to adhere to appropriate timings, including avoidance of habitat clearance during the nesting bird season. Construction activity at the site would be highly unlikely to constitute an offence based on its proximity to the habitat associated with this species, whilst measures detailed in a Construction Environmental Management Plan (CEMP) would help to ensure that noise and visual impacts associated with the development are appropriately mitigated.



The River Adur Water Meadows & Wyckham Wood Local Wildlife Site

The full description of this designation is set out in section 3.1 of the EclA. The features described in the citation note the value of the LWS as '*low lying fields of cattle and sheep grazed pasture and the network of ditches providing an extensive area of coastal and floodplain grazing marsh habitat*' in particular the citation notes the botanical value of the ditch network, including stands of common reed. The Wyckham wood portion of this site is noted as a small block of lowland mixed deciduous woodland (and identified as ancient woodland) at the northern end of the LWS.

The application site does not include any of the habitats described within the citation. It is situated some 100m from the closest wet ditch and it is not situated near Wyckham Wood. The dry location of the site, up a slope from the closest riparian habitat, presently includes a mixture of bramble *Rubus fruticosus* scrub, ruderal habitat dominated by sow thistle *Cirsium arvense*, cow parsley *Anthriscus sylvestris* cleavers *Galium aparine* and common nettle *Urtica dioica* and some areas of tall grassland dominated by false oat grass *Arrhenatherum elatius*.

Whilst the development would therefore result in a reduction in green space within the boundary of the Local Wildlife Site, it will not directly impact the habitats or species for which this site is designated. Within the appendix accompanying this addendum there is photographs supporting the current site habitat descriptions above.

The EcIA concluded that there would be a permanent negative impact at a local level of significance owing to the loss of greenspace within the Local Wildlife Site. Under CIEEM guidance, this is effectively a second level impact above 'site level' impacts. Since the conclusion of the EcIA, the landscaping strategy and BNG calculations have evolved to consider additional screening and mixed scrub habitat creation. This acts to further compensate for habitat losses, whilst the greenspace loss inevitably remains.

The application of the mitigation hierarchy is described in the EcIA at section 2.5.3 for this development and it is integrated into the impact assessment process. However, I have built this out further below as follows:

- **Avoidance.** The site location is unable to avoid the footprint of the LWS, but does occupy a location on its fringe and as set out above, avoids all of the habitats for which this site is designated – wet ditches, grazing marsh and ancient woodland.
- **Minimisation.** The proposed development is small in scale and appropriate planning conditions can help ensure the duration and intensity of development is appropriately managed. The timing of commencement of works, screening of the construction zone and management of pollution risks under a CEMP are all such examples.
- **Mitigation.** Mitigation measures have been prescribed within the EcIA in section 5. This includes construction phase measures at section 5.1.2, protection of retained habitats in section 5.2.2 and species-specific mitigation measures for bats and reptiles within sections 5.3.2 and 5.4.2.
- **Compensation.** The development proposals include a number of compensation and enhancement measures, including new hedgerow and scrub habitat creation, species-rich hedgerow mix sowing (WFG Hedgerows and Shaded Areas mix by Germinal Seeds), the creation of reptile hibernacula and the integration of new opportunities for roosting bats and nesting swifts. The efforts to create a measurable uplift in biodiversity value across the on-site and off-site habitats also ensure a local increase in habitat value that will lead to wider enhancements for nesting birds and other wildlife that utilises these habitats. This is in part through a change from a more homogenous habitat to a more varied range of habitat types, including new trees, other neutral grassland (g3c), mixed scrub (h3h), native hedgerow (h2a) and species-rich native hedgerow (h2a5), which did not form the baseline habitats.

For some context of scale, the Local Wildlife Site is 397.5ha in area and the application site measures 0.49ha in area. This means a reduction in the area of the Local Wildlife Site of 0.126%.

Biodiversity Net Gain

There appears to be a misunderstanding of how biodiversity metrics work and are calculated within the submitted representations. Bramble scrub habitat is not condition assessed within a biodiversity metric, as is the case for some other habitats. This is because the value of bramble scrub as a medium distinctiveness habitat is limited – it cannot mature and does not diversify in the way that other scrub habitat types recorded within a biodiversity metric do. Figure 2 below illustrates the condition assessment option within the Statutory Metric.

Existing area habitats					Distinctiveness		Condition		
Ref	Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Score	Condition	Score	Area/co
1	Heathland and shrub	Bramble scrub	No	0.49	Medium	4	Condition Assessment: N/A	1	Area/co
2									
3									
4									
5									
6									
7									
				Total habitat area					
				Site Area (Excluding area of individual trees, green walls, intertidal hard structures)					

Figure 2. The baseline habitat recorded for the site in the Statutory Metric.

The biodiversity metric produced by the Ecology Co-op has taken the baseline value of the site as entirely comprising of bramble scrub habitat. The baseline has been set using the highest habitat value present on site since 2020, consistent with the requirements of the Environment Act 2021, ensuring no under-recording of biodiversity value. To be clear – the condition assessment score for bramble scrub

remains the same (N/A), whether it has been recently cleared or is mature and the condition score provided for all bramble scrub habitat is correct. Whether an area of bramble scrub is mature or has been flailed, further does not alter the outcomes for the habitats proposed.

For details supporting all condition assessment scores and descriptions, please see Appendix 1 of the submitted Biodiversity Impact Calculation, which includes photographs and follows the site assessment completed on the 11th August and 11th September 2025 as set out in this report at section 2.1.

I have total confidence therefore that the BNG calculations provided within the BIC report are correct and the indicated change in biodiversity value (an increase of 1.08 habitat units; 54.97% increase) is accurate and subject to successful implementation and management will provide a genuine biodiversity value increase at the site.

Kind regards



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Appendix 1. Site photographs



Photograph 1. Some of the tall ruderal growth on the site looking southwest towards Church Farm Walk.



Photograph 2. Further tall ruderal habitat with re-establishing bramble scrub at the site looking eastwards towards the mobile home site.



Photograph 3. A mammal track visible through part of the western side of the site.



Photograph 4. The source of the mammal run where a push-through in a chain-link fence leads towards St Peters Church.