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From: [REDACTED]
Sent: 15 June 2026 10:46
To: Planning
Subject: Important Queries...DC/25/2114
Categories: Comments Received

Planning Application DC/25/2114

Further questions to be answered by The Eco Co Op and Fairfax

Dear Mr Holmes

I am writing to seek clarification regarding a number of statements contained within Eco Co-op's ecological assessments and correspondence relating to Church Farm.

In Eco Co-op's letter dated 10 December 2025, it is stated:

"This letter provides the results of an updated walkover survey of the above site, undertaken on 11th August 2025. This updates the findings of a Preliminary Ecological Appraisal undertaken in 2021; in addition to a reptile presence/absence survey and bat activity surveys were undertaken for the site in 2022."

However, within the same report, under Section 2.6 "Limitations" (Page 11), the following statement is made:

"Constraints for the survey effort at Church Farm are associated with the 2022 bat logger deployments. These surveys were conducted three years ago (at the time of writing this report) by staff no longer working at The Ecology Co-op, as such the static detector data and some of the bat activity results are no longer available. All 2022 survey data included in this report has passed the age threshold to be considered valid and so it is important to note that the 2022 survey data has been included to provide site context, rather than accurate, up-to-date results."

This appears contradictory. The December 2025 letter relies upon and updates findings from the 2022 surveys, yet the report itself acknowledges that key survey data is no longer available and that the information has exceeded the accepted validity threshold and should only be regarded as historical context.

I also note that Place Services appear to have relied upon Eco Co-op's assessments in reaching their consultation response and have stated that

"We are still satisfied that there is sufficient ecological information available to support determination of this application."

Given Eco Co-op's acknowledgement that key elements of the 2022 bat survey data are no longer available and that the survey data has exceeded the recognised validity threshold, I would be grateful if it could be explained the basis upon which Place Services have been able to reach this conclusion.

I also note that on Page 5 [1.2 Background](#) of the dated 10 December 2025 letter, Eco Co-op states:

"A Preliminary Ecological Appraisal was previously conducted by The Ecology Co-op in 2021 and again in May 2025. Both surveys identified suitable habitat for bats and reptiles associated with the scrub habitat on site, which is well connected to suitable habitat and foraging resources within the wider landscape."

Furthermore, Eco Co-op's **2022** report contained the following clear instruction at the end saying.....

"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."

This instruction clearly demonstrates that Eco Co-op recognised the ecological importance of the site and the risks associated with habitat clearance before the necessary ecological protections had been established.

Given that Eco Co-op reaffirmed in **May 2025** that the site continued to provide suitable habitat for bats and reptiles, I would be grateful if they could explain why the instruction does not appear to have been reiterated to the developer, Fairfax, prior to the flailing of the field on **4th August 2025**.

The Bat Conservation Trust states that bats rely on habitats that support abundant insect life and use features such as woodland edges, hedgerows and associated shrubbery for both foraging and commuting. Dense bramble scrub forms part of this valuable habitat mosaic, providing shelter for insects and structural connectivity across the landscape. The removal or flailing of such

vegetation immediately before an ecological survey could therefore affect habitat used by bats, including rarer species such as Barbastelle and Serotine.

Eco Co-op was clearly aware in **May 2025** of the ecological value of the site and the suitability of the habitat for protected species. Yet on **4th August 2025**, extensive flailing of the field took place. (please refer to my letter dated 10/6/26)This raises serious questions regarding the advice.....if any..... was provided to the developer and whether the ecological implications of such works were adequately communicated.

In particular, I would appreciate The Eco Co Op to answer the following questions:

- Why was Fairfax not specifically reminded of the instruction contained within Eco Co-op's 2022 report that ***no habitat clearance or site preparation work should take place until planning permission had been granted and appropriate ecological protections had been implemented?***
- Did Eco Co-op advise Fairfax that habitat clearance or modification could undermine a future planning application, as stated in the 2022 report?
- Given that suitable bat and reptile habitat was identified during both the 2021 and May 2025 assessments, why were further safeguards not recommended before the field was flailed on 4 August 2025?
- If the 2022 bat survey data had already exceeded its validity threshold and some of the underlying data was unavailable, why were updated bat and reptile surveys not recommended before works affecting the habitat were undertaken?
- How can the conclusions within the December 2025 Ecological Impact Assessment be regarded as robust when the report acknowledges that some bat activity data and static detector records are no longer available?
- Does Eco Co-op consider that Fairfax or the owner of Church Farm was provided with sufficient and appropriate ecological advice regarding the significance of the site and the potential consequences of habitat clearance?

The chronology appears particularly concerning. Eco Co-op confirmed in May 2025 that the site contained suitable habitat for bats and reptiles and had previously issued an instruction against habitat clearance before ecological protections were in place. Nevertheless, habitat clearance in the form of flailing took place on 4th August 2025. I therefore seek clarification as to whether Eco Co-op communicated its previous instruction and ecological concerns to Fairfax and the owner of Church Farm if so, when and in what form.

The owner of Church Farm completed the Planning Application Form DC/25/2114 under the section headed "Biodiversity and Geological Conservation", confirmed that there was a reasonable likelihood of protected and priority species being present both on the development site and on land adjacent to or near the proposed development. He was therefore fully aware of the ecological sensitivity of the site.

Against that background, is it merely a coincidence that the farmer chose to flail the field on 4th August, exactly one week before The Eco Co Op carried out its ecological survey on 11th August? Who gave the instruction for the field to be flailed, and why? Given the acknowledged ecological importance of the site, it is difficult to understand why such work would be undertaken immediately prior to a survey that would have been arranged and scheduled well in advance.

Given the apparent inconsistencies identified above, and the reliance placed upon Eco Co-op's findings by both the developer and Place Services, I would be grateful if The Eco Co Op could give the Horsham District Council a full and transparent explanation of the matters raised in this letter.

Yours faithfully

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Oxcroft

Sent from my iPad