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Sent: 29 May 2026 10:14
To: Planning
Subject: ECOLOGICAL CONCERNS....DC/25/2114

Categories: Comments Received

IIMPORTANT ECOLOGICAL CONCERNS
DC/25/2114

Dear Mr. Holmes

Thank you for the opportunity to provide further comments regarding planning application DC/25/2114.

I have previously submitted several reasons for objection to this application, however within this representation I wish to consolidate and emphasise the following key concerns.

Firstly, it cannot be ignored that the site was flailed in August 2021 and up until the morning of 4th August 2025 the site had not been “managed” or cut in any form as was suggested by The Eco Co Op and had effectively become a wildlife haven, containing chest-high vegetation rich in insects, bees and particularly moths....with every potential for reptiles hedgehogs and many other species. These insects and moths form a primary food source for all bat species, especially the rare and protected Barbastelle and Serotine bats that have been recorded within this field.

On 4th August 2025 a tractor equipped with flailing machinery appeared and, by the end of the day, the site had been cut to the ground, destroying the existing habitat and vegetation....dead hedgehogs were found in the field. Subsequently, on 11th August 2025 Eco Co Op carried out their first wildlife survey.

This sequence of events is highly concerning and strongly suggests deliberate habitat clearance prior to survey work, potentially in an attempt to circumvent biodiversity and protected species constraints. It is difficult to see how a developer can legitimately claim a Biodiversity Net Gain whilst simultaneously stripping or degrading the surrounding land prior to making that claim.

Photographic evidence has been previously submitted to support this.

I am also concerned by the methodology and timing of the ecological surveys undertaken. For example, the reptile survey was conducted on already flailed land and far too late in the season to hold meaningful ecological relevance.

Similarly, the bat survey was carried out between the 2nd and the 7th of October 2025, which is outside of any time guidelines given by The Bats Conservation Trust and specifically within a site that had, only two months earlier, been stripped of the vegetation supporting moth populations — the primary food source of the rare and protected Barbastelle bat. Eco Co Op recorded the passing or commuting of Barbastelle bats, however I would suggest this may simply indicate bats searching for suitable feeding habitat that had previously existed on the site.

Eco Co Op further stated that their survey work has been reliant upon previous 2022 survey data, whilst also acknowledging that much of this data is unavailable. This raises additional concerns regarding the reliability and robustness of the ecological assessment process.

The submitted ecology reports also include extensive lighting mitigation proposals, acknowledging that artificial lighting is highly detrimental to the Barbastelle bat. However, I ask how any such mitigation can realistically be effective once the development is occupied. Future residents would inevitably have the right to install and use bright security lighting, garden lighting, and vehicle headlights associated with daily movements to and from the site. These cumulative impacts would inevitably increase light disturbance within this sensitive habitat.

In addition, whilst I have reviewed the pollution mitigation report, I have specifically requested sight of a mitigation strategy relating to the construction phase itself. This is particularly important given that the site lies entirely within the designated Local Wildlife Site (LWS) known as River Adur Water Meadows and Wyckham Wood, and immediately abuts land sloping away from the construction area. Any pollution, runoff or sediment displacement during construction could therefore have serious implications for the surrounding protected habitat. I also remain concerned about the potential use of security or construction lighting during the construction phase. Given that Eco Co Op have themselves acknowledged the sensitivity of Barbastelle bats to artificial lighting, any overnight or dusk-to-dawn lighting on the site during construction would be wholly inappropriate within this Local Wildlife Site setting. I therefore request that a specific condition be imposed prohibiting night-time security or construction lighting throughout the construction phase, other than in genuine emergencies.

Furthermore, it is my understanding that these very grounds have been identified by Eco Co Op as forming part of their proposed 10% Biodiversity Net Gain provision, making the protection of this land during construction all the more critical.

I would also like to draw attention to what appears to be a significant practical issue regarding long-term site management and maintenance access. Whilst I note that management plans are proposed, there appears to be no access to the fields behind the proposed development from Church Farm Walk — as shown on the plan — due to a proposed garage fully blocking the route. This raises serious questions as to how ongoing maintenance and ecological management would realistically be carried out.

In addition, I note that the proposal references the use of a citronella-based herbicide as part of an environmentally conscious approach. However, are the applicants aware that citronella has been shown to kill significant numbers of moths, reportedly up to 75% in some circumstances? Moths are a major food source for the Barbastelle Bat, a highly protected species, and this potential ecological impact should be carefully considered.

Furthermore, I question how any maintenance team with vehicles intends to access and maintain the swale directly behind the proposed development when there is no access from Church Farm Walk. I can only presume that the alternative would involve entering from the far northern end and then driving maintenance vehicles across land that is intended to be highly protected and forms part of the sensitive Biodiversity Net Gain area. This seems contradictory to the stated environmental objectives of the scheme and requires further clarification.

The Eco Co Op specifically requested that Natural England be consulted on this application. To date, I have seen no evidence that this consultation has been undertaken, and I would appreciate clarification on whether Natural England has in fact been contacted and invited to comment.

' , the River Adur Water Meadows & Wyckham Wood Loal Wildlife Site. The site also lies within the SSS Impact Zone for Beeding Hill to Newtimber Hill SSSI and Natural England will need to be consulted on this matter. '

I respectfully ask that these concerns are forwarded to The Ecology Department of Place Services and fully considered when determining this application.

Yours faithfully



Oxcroft

Church Farm Walk

Sent from my iPad