

[REDACTED]

Sent: 08 February 2026 16:54
To: Planning
Subject: DC/25/2114 Church Farm.....Attachments x 2

Categories: Comments Received

Dear Mr Holmes

I am writing further to planning application DC/25/2114 to raise serious concerns regarding the ecological approach taken within the submitted Biodiversity Net Gain (BNG) assessment by the Eco Co Op, particularly in relation to the **land adjacent to the west of the proposed development site.**

The submitted ecology and BNG documentation by The Eco Co Op describes this piece of land as h3d and assessed as

- o *bramble scrub (condition N/A) - h3d to mixed scrub (moderate condition)*

and has been reported as 'cleared'

Area shown as h3d has **not** been fully cleared, and **retains established vegetation and biodiversity value.**

Despite this, the site for the actual development proposal was fully flailed on 4 August 2025, shortly before ecological survey work commenced on 11 August 2025, resulting in an artificially simplified habitat being recorded.

This distinction is important. Under the Environment Act 2021 and the Biodiversity Metric, existing habitats form part of the ecological baseline. They cannot be counted as biodiversity "gain" unless a demonstrable, measurable increase in biodiversity units can be shown over and above the baseline condition, in accordance with the principle of additionality. Minor planting or landscaping within an already established habitat

does not, in itself, constitute net gain unless it results in a genuine uplift in habitat condition or distinctiveness, secured for a minimum of 30 years.

The approach taken here is deeply concerning in planning terms. The felling of a biodiversity-rich area immediately prior to survey has the effect of degrading the recorded baseline, after which the same land is relied upon within the BNG assessment as being capable of enhancement, with subsequent planting used to claim compliance with the 10% net gain requirement. This allows biodiversity value that already existed to be temporarily suppressed and then re-counted as a “gain”, which does not constitute genuine Biodiversity Net Gain and fails to meet the statutory requirement for additionality.

National conservation bodies, including The Wildlife Trusts, explicitly recognise bramble and mixed scrub habitats as biodiversity-rich and ecologically important. Such habitats provide critical food, shelter and nesting opportunities for a wide range of birds, invertebrates and mammals, including priority and declining species, and form an important component of biodiverse habitat mosaics. As The Wildlife Trusts note, bramble’s dense growth offers valuable protection for nesting birds, an important source of nectar, and shelter for species such as hedgehogs and dormice.

<https://www.wildlifetrusts.org/wildlife-explorer/wildflowers/bramble>

The submitted ecology report has been prepared by Meerabai Kings MSci, a Consultant Ecologist at The Ecology Co-op with over two years’ professional experience. As a qualifying member of the Chartered Institute for Ecology and Environmental Management (CIEEM), she is bound by CIEEM’s Code of Professional Conduct, which requires members to act with integrity, provide objective and robust evidence, and avoid actions that could misrepresent ecological value or undermine public confidence in ecological assessments.

CIEEM, as the UK’s professional body for ecologists, has consistently emphasised that Biodiversity Net Gain must deliver genuine, measurable gains and be underpinned by robust and representative baseline data. Professional best practice does not support the manipulation or artificial degradation of baseline conditions, nor the re-counting of previously existing biodiversity value as a “gain”, as this undermines the statutory requirement for additionality under the Environment Act 2021 and the integrity of the Biodiversity Net Gain framework.

Where habitats are artificially degraded immediately prior to survey, as appears to be the case with this application, and subsequently relied upon for claimed biodiversity uplift, the resulting calculations cannot be regarded as reflecting genuine net gain. Acceptance of such evidence would conflict with the professional standards promoted

by CIEEM and risks reliance on biodiversity assessments that do not deliver the outcomes that mandatory Biodiversity Net Gain is intended to secure.

The conclusion figures shown in Eco Co Ops report is a large percentage gain only because the baseline has been recorded as artificially low; if the existing biodiversity were properly reflected, the claimed 10% net gain would be significantly reduced or may not be achieved at all.

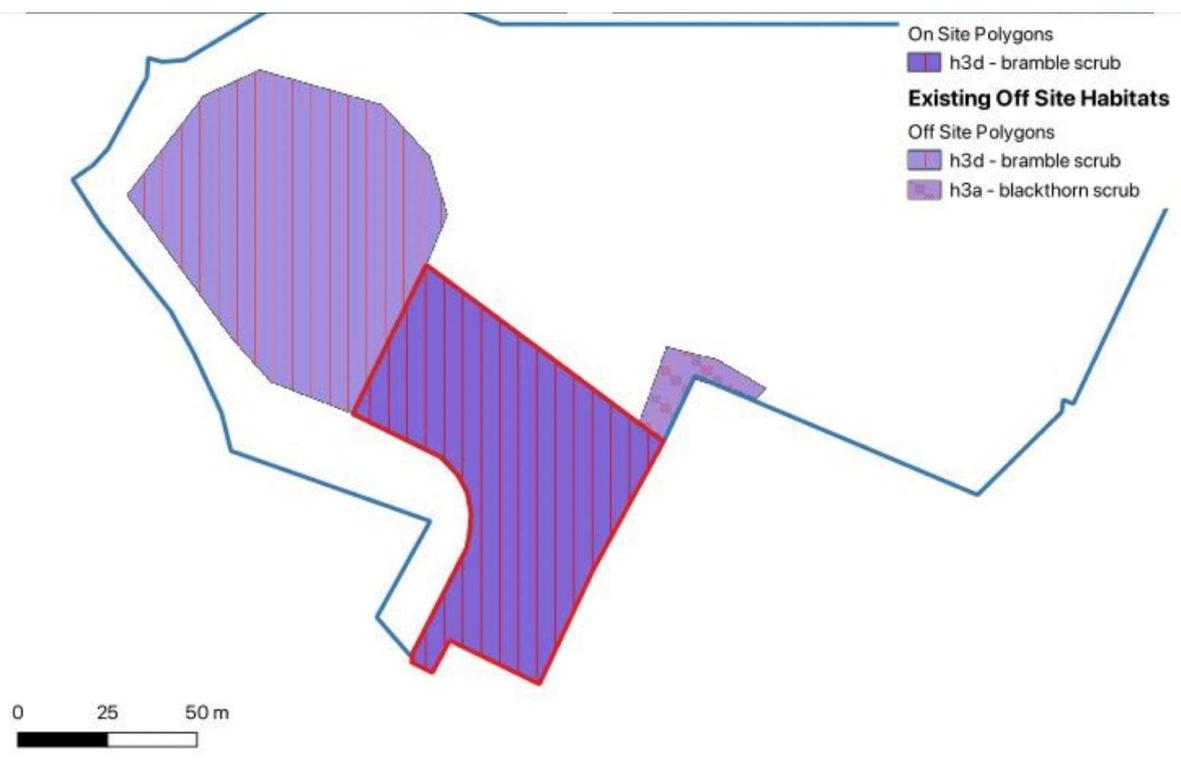
Given the statutory importance of Biodiversity Net Gain, I respectfully request that Horsham District Council scrutinises this aspect of the application carefully and does not place reliance on biodiversity calculations derived from an artificially manipulated or inaccurately represented baseline.

In light of the fundamental flaws outlined above, the Ecology Report is wholly unreliable and should be afforded no weight in decision-making for the planning application DC/25/2114 at Church Farm.

Kind regards



Oxcroft
Church Farm Walk
Upper Beeding
BN44 3HD



Above diagram....on left h3d claimed as cleared.....this only partly cleared

Steining - Upper Beeding

4 August 2025 16:23

