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Sent: 09 February 2026 18:29
To: Planning
Subject: Ref: DC/25/2114

Categories: Comments Received

Dear Sir/Madam,

Re: Planning Application DC/25/2114 – Proposed Housing Development at Church Farm Field, Upper Beeding, West Sussex

I am writing to formally object to the proposed housing development at Church Farm Field, Upper Beeding, on the grounds of serious concerns relating to highways safety, protected wildlife, and inadequate ecological assessment.

1. Highways and Public Safety

The declared access to the site via **Church Lane** presents a significant and unacceptable risk to public safety. Church Lane is a **single-track rural lane with no footpath** and is regularly used by pedestrians, including parents with pushchairs, young children, elderly residents, and those with disabilities.

The developer's Transport Report claims the presence of "grass verges". In reality, these are **steep, privately owned grass banks**, which are not usable or safe as pedestrian refuges. It is entirely unreasonable to suggest that pedestrians should step into private driveways or front gardens to avoid oncoming traffic. This is neither safe nor acceptable.

Church Lane is heavily used by:

- Visitors to the Church Hall and Church Café,
- Children and walking groups using the river route to Steyning,
- Local residents accessing daily services.

The introduction of heavy construction traffic would significantly increase the risk of collisions between vehicles and vulnerable road users.

This proposal is in direct conflict with the **National Planning Policy Framework (NPPF)** which states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety." (NPPF, Paragraph 115)

and:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be

made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” (NPPF, Paragraph 108)

This development fails to provide **safe and suitable access for all users**, particularly pedestrians.

2. Impact on Protected Wildlife

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Bats – Barbastelle Bat

The site supports at least **12 species of bats**, including the **Barbastelle bat**, one of the rarest bat species in the UK. This species and its habitat are protected under the:

- **Conservation of Habitats and Species Regulations 2017**, and
- The **Habitats Directive**.

Barbastelle bats are **highly sensitive to light pollution**, and any form of residential lighting would severely disrupt their foraging behaviour. As such, claims that mitigation can adequately protect this species are not credible or realistic.

Under UK law, it is unlawful to approve development where it is likely to result in harm to European Protected Species without robust evidence and enforceable mitigation.

In addition, the site is home to many mature trees and diverse habitats which support over 30-40 different bird species at various times of year, being close to the flood plains on the River Adur.

3. Inadequate Ecological Surveys

The NPPF requires that ecological surveys be **adequate, proportionate, and based on accurate baseline conditions**.

The deliberate clearance of the site prior to ecological assessment has:

- Artificially reduced the visible ecological value of the land,

- Invalidated the baseline for biodiversity measurement,
- Undermined the requirement for a **minimum 10% biodiversity net gain**.

This practice directly contradicts national policy and makes any biodiversity calculations unreliable and legally unsound.

Conclusion

This application fails to meet the fundamental requirements of:

- Public safety,
- Environmental protection,
- Legal compliance with national planning policy and wildlife legislation.

The development poses unacceptable risks to pedestrians, threatens legally protected species, and is supported by flawed and misleading ecological evidence. For these reasons, I strongly urge Horsham District Council to **refuse planning permission** for this proposal.

Yours faithfully,

, Malthouse Cottage, High Street, Upper Beeding BN44 3WN

Member of Greening Steyning Biodiversity Group