

Due to relevant planning material considerations, I wish to register my objection to the planning application DC/25/2114. Developing land at Church Farm would contravene Planning Policy including government guidance and be detrimental to local highway safety.

The National Planning Policy Framework states the following:

### **Habitats and biodiversity**

“Paragraph 192. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and **safeguard** components of **local wildlife-rich habitats** and wider ecological networks, including the hierarchy of international, **national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones** that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.”

The site’s significance to wildlife has been identified locally as it lies entirely within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site. Indeed, the Ecology Coop say in their 2025 report, “As the site lies within the River Adur Water Meadows and Wyckham Wood LWS, the removal of scrub habitat within the LWS is unavoidable for this proposal.”

Their report admits to “Residual Effects. With the implementation of the above measures, the potential residual impact on the River Adur Water Meadows and Wyckham Wood LWS will remain a **permanent negative impact at a local level** due to the inevitable loss of scrub habitat and slight increase in footfall and recreational pressure within the Local Wildlife Site.”

Financial incentives will not compensate for the loss of a **local wildlife-rich habitat** that is vital to twelve bat species, ██████████ hedgehogs, grass snakes and slow worms, all of which are **protected species**, as well as all the insect life on which these species depend and which the scrub habitat supports.

On a national level, the proximity of the site to the South Downs National Park and the fact that it lies within the risk zone of the Beeding Hill to Newtimber Hill SSSI should also be considered.

Consequently, the proposed development contradicts paragraph 192 of the NPPF as **it fails to safeguard this local wildlife-rich habitat**. Indeed, it would be damaging to the wider ecological network of the area.

As anyone who lives locally and enjoys walking on the surrounding footpaths knows, the ecology and biodiversity of this site is extraordinary. The site is exceptional due to its mixture of habitats which are in turn due to the unique topography of the site. The southern part of the site lies at approximately 8 metres above sea level, gently sloping down to the brooks to the north. To the west lies ancient woodland, to the east bramble scrub.

The bramble scrub supports many species providing both food and shelter: mammals including hedgehogs and ██████████ dormice, wood mice and foxes; birds of many species; insects including bumblebees, moths and butterflies and many other invertebrates.

The insects and invertebrates in turn feed an extraordinary range of birds as can be evidenced by Merlin recordings. Indeed, ornithologists frequent the area as it is renowned for its bird life. We recently went on a guided walk of Beeding Brooks with Shoreham District Ornithological Society and were taken along the public footpath which borders the northern edge of the site. As a group we

looked across the site with our cameras and binoculars as there were so many birds. We also listened to the Song Thrushes (amber listed) at dusk from the north-western corner of the site.

Tawny Owls:

Tawny Owls (amber listed) are heard in the trees directly adjacent to the site entrance. The field where the proposed development would be is their territory. Building on this site will permanently destroy a vital part of the Tawny Owl's territory and hunting grounds. Their presence bears testament to the small mammal population that the field supports. Removing this habitat by building on it will directly impact on their survival here. This cannot be mitigated. We have heard Tawny Owls in the trees that border the field where the development is proposed every year for more than twenty years. We regularly record them on the Merlin Bird ID app from our garden and have recorded some of these on iRecord, just yards away from the site. This points to the long-term relationship Tawny Owls have had with this site. As nocturnal hunters they require the darkness and silence that the field affords. A development would not only remove their habitat but also introduce light pollution into an area with exceptional dark sky purity and silence. Tawny Owls hunt using their highly sensitive hearing to locate prey under cover of darkness.

We frequently record the following; both the dawn and dusk chorus are glorious:

Robin, Wren, Blackbird, Song Thrush, House Sparrow, Blue Tit, Great Tit, Long-tailed Tit, Greenfinch, Goldcrest, Dunnock, Chaffinch, Chiffchaff, Yellowhammer, Barn Swallow, Blackcap, Collared Dove, Wood Pigeon, Stock Dove, Jackdaw, Carrion Crow, Rook, Jay, Magpie, Greater Spotted Woodpecker, Green Woodpecker, Tawny Owl, Common Buzzard and Linnet etc.

I trust an updated record search of the Sussex Biodiversity Record Centre will be requested by the Case Officer for the application. The recordings within a 2km radius on both iRecord and eBird are testament to the abundance of wildlife in this area. This site is exceptional due to its unique topography and mixture of habitats. Even with a 0.5km radius there is a remarkable number of species. Records on iRecord must be viewed as evidence of the biodiversity of this site.

### **The flailing of the site**

The bramble scrub is also an ideal habitat for grass snakes and slow worms. We often find slow worms in our garden. The Ecology Coop's surveys are flawed as the site was flailed on the 4<sup>th</sup> August 2025 stripping the field of the mature mixed bramble scrub with no regard for the wildlife living within it. The Ecology Coop carried out their first survey a week later on the 11<sup>th</sup> August as if that would give a true reflection of the habitat and its biodiversity. This is truly shocking. Even so, juvenile grass snakes were found in the September and October reptile surveys; evidence that a breeding population of grass snakes survived the mechanical flailing and still live on the site. No doubt more would have been found if the survey had been carried out in an ethical manner when the scrub was at its full summer height. Reptiles will not enter vegetation below a height of 15 cm as they are at risk from predators without sufficient growth to hide within. It was therefore no surprise that reptiles were only recorded around the perimeter of the site. It would be too unsafe for them to risk venturing into the middle now that the scrub had been flailed.

In her Ecology Consultation Response for the 2022 application, Genevieve Broad, Ecological Consultant for Place Services states:

"We note that the site has been cleared of bramble scrub prior to the ecology survey."

It is shocking and unacceptable that the developers have used this tactic again, trying once more to degrade the habitat immediately prior to ecological surveying, in their aim to inflate their figures for Biodiversity Net Gain.

### **Protection of priority species**

Paragraph 192 of the NPPF also states that plans should:

“b) promote the **conservation**, restoration and enhancement of **priority habitats**, ecological networks and the **protection** and recovery of **priority species**; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

Bats:

The ancient woodland is home to an exceptional number of species of bats – 12 out of the 18 species which exist in the UK were recorded here this autumn. This is truly extraordinary.

Barbastelle bat:

The range of bats include the rare Barbastelle bat, the nearest other location where the Barbastelle has been recorded is Tottington Woods which demonstrates how important this site is as a wildlife haven within the surrounding area. It is also noteworthy that the rare Barbastelle bat was recorded by the Ecology Coop in their surveys of both 2022 and 2025, further underlining the importance of this site to one of the UK’s rare and protected species.

Barbastelle bat - habitat

The Bat Conservation Trust states that “the barbastelle is very rare.

It is thought that they prefer pastoral landscapes with deciduous woodland, wet meadows and water bodies, such as woodland streams and rivers.”

This is exactly the habitat found at the proposed development site: a field of bramble scrub with ancient woodland sloping down to wet meadows and the brook bordering the site.

Barbastelle bat – light pollution

Barbastelle bats avoid light. The additional lighting, both at street and domestic level, arising from the proposed development will harm those bats, such as the rare Barbastelle, that avoid light. Artificial lighting is a significant threat. Indeed, the Ecology Coop draw attention to the effect of artificial light on bats, including the spill of light on to the surrounding area, inevitably including the wooded boundary and boundary vegetation, as well as the woodland parcel to the west of the site. At present, this area has zero light pollution which is evidenced by the twelve species of bats. It is not possible to prevent people from using porch lighting, security lighting and garden lighting. The Ecology Coop’s suggested mitigation measures will not in any way prove successful in preventing the inevitable impact that light pollution will have on the highly light sensitive bat species that exist here.

Bats – bramble scrub

The development will also remove vital foraging resources for all bats recorded at the site by reducing the area of bramble scrub, and subsequently, the many insects which rely upon it.

It is no surprise that the site is a magnet for bats with its ancient woodland, veteran trees, abundance of mixed scrub and proximity to St Peter's Church - ideal locations for roosting, commuting and hunting.

The Ecology Coop admit that "The valuable western woodland edge boundary will be retained as part of the works but there will be an **unavoidable loss of scrub habitat** which provides a valuable supply of invertebrate prey for foraging bats."

The woodland and scrub habitats are **INTERLINKED** and **CANNOT BE VIEWED IN ISOLATION**. If one is removed, the other is negatively affected. Bats require both habitats for their survival. The twelve bat species here are evidence of this. It will not be possible to support the exceptional diversity of bat species recorded at this site without all the habitats that these species require.

Again, from the Ecology Coop:

"There remains a permanent loss of scrub habitat at the site and this will have an **adverse** effect on bats at the **local** level.

On this point alone, the proposal should be refused as bats are a protected species and the Barbastelle, particularly rare.

### **Brook – Contamination:**

There is also the risk of contamination to the chalk fed waters of the brook innings which runs along the bottom of the field to the north and around the ancient woodland to the west.

*Aqua Terra's Church Farm: Flood Risk Assessment and Outline Drainage Strategy* states:

"A SuDS Strategy has been drafted and includes at source controls through porous paving acting as attenuation storage along the access road, leading to a swale running along the back of the proposed dwellings, before discharging to a surface drain at a controlled rate which will drain to the River Adur."

The "surface drain" referred to above is, I believe, the brook which runs to the north and west of the site and takes water from the Beeding Brooks to the River Adur at Saltings Field. This waterway is, in fact, of immense wildlife value.

It is also chalk fed. The solid geology of the site is the West Melbury Marly Chalk Formation (White Chalk). This means that rainwater percolating through this geology results in lime rich groundwater entering the brook. This rare chemistry creates a unique habitat and is a critical component as to why this waterway has such high value to both flora and fauna.

In their 2022 report, the Ecology Coop state:

"The site lies within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site and it will be essential that run-off and pollution are tightly controlled."

Why now is it deemed appropriate for run off to drain into the "surface drain" which is in fact the brook? Pollutants including herbicides and pesticides, from vehicles including diesel, petrol and oil, car washing products, building works and maintenance works, other household chemicals and spills could all have catastrophic consequences as sudden contamination events, as well as cumulatively, resulting in long-term contamination of the waterway and riparian zone.

Surface run-off cannot be released into the sewage system. This has been confirmed by Southern Water in its response. Sewage will have to be pumped uphill with the risk of back flow and potential discharge into the brook.

In their 2022 response to the development proposal, Sussex Wildlife Trust state:

“We are also concerned that the development may result in indirect impacts to the remaining LWS through surface water run-off and the general litter and pollution associated with having houses in close proximity to designated sites.”

The brook supports a vast array of species. It is known for its important plant species and its dragonflies are recognised by experts in the field as being exceptionally diverse. The need to urgently clean up our rivers, including the River Adur, is now understood - **we cannot risk contamination of this brook.**

### **Riparian Zone**

Nothing is mentioned of the riparian zone. This was included as a priority habitat in the Ecology Coop's 2022 report. Why has this been omitted in their 2025 reports? Lime rich riparian zones are known to be some of the most important habitats for a huge array of species. The riparian zone north of the site is a priority habitat.

The highly protected rare bat species are recognised as requiring a mix of habitats for foraging including the waterway and riparian zone.

Contamination of these habitats will not only reduce invertebrate populations on which the bats rely but will also poison bats through the absorption of chemicals from insects which have themselves absorbed them. Bats' sensitivity to chemical pollution is well documented. The Barbastelle bat is recognised as a highly vulnerable species and is critically sensitive to changes in its environment. The stability of the site over many years has made this site a priority site for Barbastelles and all of the eleven other bat species recorded here. The mix of habitats including the waterway and riparian zone, the scrub field grassland and ancient woodland make this an exceptional site for bats and many other species. Its purity in terms of light, noise, and chemical pollution and its exceptional mix of habitats make it a rare haven that is unique in this area.

### **Noise Pollution – Anthropogenic Noise:**

Echolocating bats, especially the rarer species, are reliant on being able to hear minute changes in their calls. The site currently has exceptionally low levels of noise pollution. All animal species move away from man made sound. This is well documented across all wild species. Anthropogenic noise is seen as a major form of stress on animal populations but also human populations. The site is enjoyed by the extraordinary wildlife and in turn walkers on the path to the north gain respite and enjoyment from the silence and sounds of nature that abound here. The development will necessarily impact on this. Car engines, delivery vans, lorries, radios, power-tools, lawnmowers, even human voices will all have a detrimental effect on this precious place. This cannot be mitigated. It is not possible to stop people from revving engines, using power-tools, DIY, jet washers, mowers, strimmers etc.

The Ecology Coop have admitted that the development will have inevitable and unavoidable consequence that will impact on the natural environment that cannot be mitigated.

## **Highways and Access**

NPPF paragraph 115 states that planning proposals need to demonstrate that “**safe and suitable access to the site can be achieved for all users**”.

As the proposed access to the site is via the extremely narrow, single track Church Lane, this is not possible. Church Lane cannot be expanded as it is framed by a steep grassy bank to the north and property boundaries to the south. There are no verges which could enable any meaningful expansion such as providing a passing place.

This part of Church Lane is also a public bridleway and as such it is used by a high number of pedestrians on their way to the Church, activities at the Gladys Bevan Church Hall, walks along the river or pedestrian access into Steyning via the newly replaced White Bridge (a tremendous asset to the community). As such, there is already a danger to pedestrians who have to share the “footpath” with a disproportionate number of vehicles. Not only are the vehicles of those who live in that part of Church Lane, Church Farm Walk or Church Close having to use the lane (their only way of accessing their homes), there are also vehicles accessing St Peter’s Church, dog walkers driving to the church car park and vehicles often picking up and dropping off children attending activities at the Gladys Bevan Hall. There are also an increasing number of delivery vans, often driving very fast. The lane is particularly hazardous in winter evenings at drop off or pick up time when it is dark. To add further traffic, with a likely further 8 vehicles as at least 2 each are likely in the proposed 4 detached family homes, not to mention the construction traffic during the build, is irrational and reckless with extremely high risks. This should not be allowed to happen. There is serious risk of a fatality if further pressure is exerted in the use of this single-track footpath as the only access road to the proposed development. There is also the risk emergency vehicles could be delayed when the road is blocked by delivery vehicles or vehicles queuing up unable to pass.

## **Design & Appearance**

Contrary to the design statement’s claims, the development will be visible from the public footpath that borders the field to the north. As the ground slopes up, it is impossible to hide the development, as even planting native species and hedgerows will not be able to hide the houses or their roofs as such planting will necessarily be below. Consequently, the development will spoil the rural outlook and be viewed as urbanisation. Indeed, the footpath is part of the Upper Beeding Heritage Trail. On the trail map, produced in a series entitled *Exploring Horsham District’s Heritage* walkers are recommended to look out for wildlife as they walk this very path:

“To your right now is an area of wild brooks. What wildlife can you spot here? Take your time - it’s a haven for all kinds of creatures, including several species of owl.”

## **Previous objections to planning proposals**

Another major factor against the proposed development is that the site was fully considered and subsequently rejected by Upper Beeding Parish Council and therefore not included in the Upper Beeding Neighbour Plan of 2018. The Council also rejected the developer’s proposal for development in 2022. The Council made their reasons clear on both occasions and have repeated them in their objection to this current application as nothing has changed to advise them otherwise.

- o The site is adjacent to the BUAB.
- o The current access is not adequate.

