

By email only

planning@horsham.gov.uk
FAO Daniel Holmes

Contact: Conservation Team

E-mail: swtconservation@sussexwt.org.uk

Date: 9 February 26

Dear Mr Holmes

Planning application reference: DC/25/2114

Description: Erection of 4 No. detached dwellings with associated amenity space, car parking spaces, detached carports, access road and other associated infrastructure

Location: Land at 519396 111237, Church Farm Walk, Upper Beeding, West Sussex

Sussex Wildlife Trust **objects** to this application due to its impacts on biodiversity. We note this is a resubmission of planning application DC/22/0618 and would kindly refer you to the comments made in our previous objection to DC/22/0618.

Impact on designated sites

The development site sits entirely within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site (LWS) and will result in the destruction of a proportion of the site. This is contrary to Policies 25 and 31 of the Horsham District Planning Framework (HDPF) and paragraphs 188 and 192 of the National Planning Policy Framework (NPPF), which require locally designated sites to be safeguarded.

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

It is noted in the Ecological Impact Assessment (EIA) (4.1.2) that the habitats present within the development site (i.e. cleared bramble scrub) are not considered to be consistent with the features of conservation importance within the LWS designation (i.e. grazing marsh). However, the condition of a LWS does not diminish the protection afforded to it within the planning system, and a LWS in poor condition is capable of recovery. The LWS's current condition should not be used to justify its proposed partial destruction, and the LWS should still be considered a vital element of the local ecological network.

First Floor, The Keep, Woollards Way, Brighton, BN1 9BP
01273 492630 | enquiries@sussexwt.org.uk | sussexwildlifetrust.org.uk

Impact on protected species

Updated ecological evidence has been submitted with DC/25/2114 that identifies suitable habitat of 'moderate value' for bats associated with the scrub and woodland edge habitat on site, which is well connected to the wider landscape. Survey work carried out in 2022 and 2025 confirmed the site is of local importance for bats, identifying the presence of foraging and commuting bats including Common Pipistrelle, Soprano Pipistrelle, Noctule and most notably Barbastelle.

The Barbastelle bat is one of Britain's rarest mammals and West Sussex supports internationally important breeding populations within the West Weald landscape. Automatic static bat detecting on the development site in 2025 recorded a 'low' number of eight average nightly passes by Barbastelle (EIA 3.3.2) but, given its rarity, even a low number of recorded passes is significant for this species and could increase the importance of the site for bats beyond a local level.

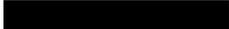
Barbastelle bats rely heavily on floodplain grasslands as key feeding grounds and are likely to be commuting through the LWS to the coastal floodplain grazing marsh in the surrounding landscape (EIA Figure 7). These commuting routes should be protected and enhanced, particularly in relation to the impacts of artificial lighting at night. Bats have specific requirements in relation to artificial lighting at night and the Barbastelle is considered highly light-adverse. It is not clear whether the required sensitive lighting plan has yet been submitted and we query whether this has been fully and adequately addressed, particularly in relation to the specific sensitivities of the Barbastelle.

Artificial lighting at night has been shown to be particularly harmful near woodland edges and hedgerows. The EIA identifies (3.3.4) the site's western woodland edge boundary as the most important area for bats but the proposed access road runs directly alongside it, as does the boundary of a residential property and garden. It is unclear whether the proposed native hedgerows (Landscape Proposal CSA/5627/104, REV D) alongside the access road and residential boundary will provide an effective dark buffer zone for bats and for Barbastelle specifically, either in terms of time to establishment (since new native hedgerow is to be planted) or its overall width. The Habitat Management and Monitoring Plan suggests a width >1.5m but a 5-metre minimum is often suggested, and this should be designed according to site specific parameters and following best practice guidance.

Summary

Sussex Wildlife Trust objects to this proposal because it will result in direct loss to a locally designated site and negatively impact a protected species (Barbastelle bat). The proposal is not consistent with the adopted Upper Beeding Neighbourhood Plan, being unallocated and outside of the built-up area boundary. Further to this, it is not compliant with policies 25, 26 or 31 of the HDPF or paragraphs 188 or 192 of the NPPF.

Yours sincerely


Conservation Manager
Sussex Wildlife Trust