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From: [REDACTED]
Sent: 22 June 2026 10:41
To: Planning
Subject: FW: Serious Urgent Concerns about Ecology and Biodiversity of Planning Application DC/25/2114

Categories: Comments Received

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From: [REDACTED]
Sent: 21 June 2026 17:58
To: [REDACTED]
Subject: Serious Urgent Concerns about Ecology and Biodiversity of Planning Application DC/25/2114

Serious Urgent Concerns about Ecology and Biodiversity of Planning Application DC/25/2114

Dear Ms Hartley

I am writing to raise serious ecological concerns regarding planning application DC/25/2114, which I believe warrant careful and immediate consideration.

Whilst I have been able to use the Public Access platform to submit my views and objections throughout the consultation process, now that the application is approaching determination I feel it necessary to raise these concerns directly with you. This is particularly in light of the letter submitted by Hayley Dean of Place Services, which appears to rely heavily upon ecological information and conclusions provided by The Eco Co-Op, a consultant retained by the applicant, Fairfax.

Having carefully reviewed the information contained within that correspondence, I believe there are a number of significant issues that warrant further scrutiny. Given that Place Services' assessment appears to be substantially dependent upon information originating from a party engaged by the developer, it is essential that the evidence is subject to robust and independent scrutiny.

As set out in the points below, there are serious concerns regarding the accuracy, completeness and reliability of the ecological information upon which Place Services appear to have based their conclusions.

Given the importance of ecological considerations in the determination of this application, I respectfully request that these matters are fully investigated before any decision is made.

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=93F632520E6B4650A619FACBA1756D1B

Within the application form..... https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=4DED14D796534A36AC27DFB684091243

Apparent Inconsistency in the Biodiversity Net Gain Declaration

The Biodiversity Net Gain (BNG) declaration submitted with the application answers “No” to the following question:

“Has there been any loss (or degradation) of any onsite habitat(s), resulting from activities carried out before the date the onsite pre-development biodiversity value was calculated, either:
• *on or after 30 January 2020 which were not in accordance with a planning permission; or*
• *on or after 25 August 2023 which were in accordance with a planning permission?”*

However, the applicant’s own ecological evidence appears to record the clearance of onsite habitat during the relevant period.

Evidence Contained Within the Ecological Impact Assessment

The Ecological Impact Assessment prepared by Eco Co Ops and dated 7 March 2022 records that... *an initial site assessment was attempted on 22 June 2021 but could not be completed because: “the site was densely vegetated with bramble scrub and impassable.”*

The report then states:

“Site clearance took place within the intervening time...”

and further records that:

“much of the remainder of the site was subsequently cleared by the land owner in early October.”

The report also confirms that the habitat present before this clearance must remain the ecological baseline, stating:

“This EclA and any subsequent Biodiversity Impact Calculation (BIC), must consider the original scrub habitat as a baseline, to ensure that development impacts are appropriately considered and the development results in an appropriately measured net gain in biodiversity.”

Chronology

22 June 2021

Eco Co Ops attempt an ecological survey.

The site is recorded as being “densely vegetated with bramble scrub and impassable.”

Early October 2021

The Ecological Impact Assessment records that “much of the remainder of the site was subsequently cleared by the land owner.”

12 October 2021

Ecological surveys are undertaken after the clearance has occurred.

7 March 2022

Eco Co Ops issue the Ecological Impact Assessment documenting both the pre-clearance habitat and the subsequent clearance.

4 August 2025

Further vegetation clearance takes place on the site.

Dated photographic evidence is available showing this clearance.

11 August 2025

Eco Co Ops commence further ecological survey work and Biodiversity Net Gain calculations.

Importantly I also note that the Eco Co Ops **2022** and 2025 report contains the following advisory statement:

“It is important that no habitat clearance or other site preparation work should be undertaken until planning permission has been granted and all relevant protections for habitats of importance and protected species have been detailed and implemented. Please be advised that any work to remove or modify habitats outside of typical management may undermine a future planning application.”

Witness Evidence Regarding Site Management

I would also draw the Council’s attention to the observations of local residents who have had continuous views of the site over a number of years.

Four neighbouring residents, including myself, each with direct knowledge of the site, are willing to provide signed witness statements regarding the condition and management of the field. These include:

Two residents whose properties directly overlook the site and who have had regular visual observation of the field.

Two residents living within approximately 20 metres of the site who regularly observe and enjoy the wildlife associated with the field.

The consistent observation of these residents is that, following the major habitat clearance undertaken in October 2021, the field was **not** subject to routine management, maintenance, vegetation control or further clearance activity until **4 August 2025**.

During this period, the site was left undisturbed and underwent substantial natural regeneration.

Residents observed extensive chest-high bramble scrub across much of the site immediately prior to the flailing works undertaken on 4 August 2025.

This habitat accords with descriptions provided by The Wildlife Trust, which recognises bramble-dominated scrub as being of significant ecological value, providing shelter, breeding habitat and a rich source of nectar for invertebrates. Such habitats also support abundant insect populations, creating important foraging opportunities for insectivorous bat species, particularly where scrub forms part of connected woodland edge and hedgerow networks.

This point is particularly relevant given that Barbastelle and Serotine bats, together with a number of other protected and notable species, have been recorded on or adjacent to the site.

Residents report that, by the **end of the day of 4 August 2025**, much of the field had been reduced to flattened and heavily disturbed ground following flail operations.

The photographic evidence submitted with this representation appears consistent with these observations. In particular, vegetation visible along the margins of the flailed area appears indicative of prolonged unmanaged growth rather than routinely maintained vegetation.

It is also notable that the machinery used on 4 August 2025 was a tractor-mounted flail. Such equipment is typically used for the clearance of dense vegetation, including bramble scrub, rough grassland and heavily overgrown habitats. The apparent need for this machinery is consistent with residents’ observations that the site had **not** been routinely managed between **October 2021 and August 2025**.

The visible contrast between the freshly flailed areas and the surrounding vegetation shown in the submitted photographs further appears to demonstrate the extent of natural regrowth that had occurred during this period.

Should the Council consider it necessary, the residents are willing to provide formal signed statements detailing their observations of the site’s condition between October 2021 and August 2025.

Description of the Site Prior to the August 2025 Clearance

I also wish to draw the Council’s attention to comments made by Hayley Dean of Place Services in her consultation response dated 10 June 2026.

That response states:

“We are still satisfied that there is sufficient ecological information available to support determination of this application.”

The same response further states:

“We understand from the Ecology Letter (The Ecology Co-op, December 2025) that dense bramble scrub had been removed between the two visits to the site in 2021 and that the remaining scrub had been recently flailed before the update walkover survey in August 2025.”

The reference to “remaining scrub” does not, in my view, accurately reflect the condition of the site immediately prior to the flailing works undertaken on 4 August 2025.

Based on the observations of neighbouring residents, together with the photographic evidence submitted, the habitat present immediately before the August 2025 clearance appears to have consisted of substantial naturally regenerated bramble scrub that had developed over a period of almost four years without routine management or maintenance.

If the habitat present immediately prior to 4 August 2025 was materially more extensive than implied by the description of “remaining scrub”, this raises an important question as to whether the ecological information currently before the Council fully reflects the condition, extent and biodiversity value of the site before that clearance took place.

I therefore respectfully request that the Council carefully considers the photographic evidence showing the extent of vegetation present immediately prior to 4 August 2025 and satisfies itself that the submitted ecological assessment and Biodiversity Net Gain calculations accurately reflect the habitat that existed on the site before clearance.

Additional Concerns Regarding Habitat Classification and Management History

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=97562F1137D84D8E9774C832841E74D0

The Ecology Co-op’s Habitat Management and Monitoring Plan contains what appear to be significant factual inaccuracies regarding both the classification of off-site habitat and the management history of the existing bramble and blackthorn scrub. The Plan states that the off-site area to the west of the site comprises “recently cleared/flailed bramble scrub” with a condition of “N/A” and a score of 1. However, local observations indicate that this area has **not** been recently cleared or flailed. If this habitat has been incorrectly classified, then the Biodiversity Net Gain assessment may be based on an inaccurate habitat description and condition assessment, resulting in an incorrect BNG calculation.

The same Plan also states on page 10 that the scrub is *“infrequently managed, with an approximately annual cut back”* and that it was *“subject to a full cut in 2021 due to the need for tree maintenance onsite.”*

These statements are also disputed.

Residents with direct knowledge of the site report that the field was **not** subject to any approximate annual cut back, and that the only tree work undertaken in 2021 involved the removal of a single tree near the site entrance and boundary for safety reasons.

This isolated tree removal did not require, justify or necessitate the flailing of the **entire field**.

Consequently, the Plan appears to misrepresent the actual management history of the site and risks establishing a misleading ecological baseline for both habitat assessment and future management proposals.

Local residents are willing to provide firsthand evidence confirming the site’s management history and challenging the accuracy of the statements contained within the Plan.

Matters Requiring Clarification

Based upon the documents submitted with the application, the following matters appear to be established:

A substantial bramble scrub habitat existed on the site in June 2021.

The site was sufficiently vegetated that ecological survey work could not initially be completed.

The Ecological Impact Assessment records that much of the site was subsequently cleared by the landowner in early October 2021.

This clearance occurred after 30 January 2020, the date specified within the Biodiversity Net Gain declaration.

The Ecological Impact Assessment states that the original scrub habitat must continue to be used as the ecological baseline when assessing biodiversity impacts.

The report also warns that habitat clearance or modification outside normal management may undermine a future planning application.

Four neighbouring residents with direct and continuous observations of the site state that no routine maintenance, vegetation management or clearance took place between October 2021 and 4 August 2025. Further vegetation clearance took place on 4 August 2025.

Photographic evidence indicates that substantial vegetation and natural regrowth existed immediately prior to that clearance.

In light of the above, I would be grateful if the Council could clarify:

How the response of “No” within the Biodiversity Net Gain declaration has been assessed in relation to the habitat clearance recorded within the ecological reports.

Whether the October 2021 habitat clearance and subsequent August 2025 clearance have been fully considered when determining the site’s pre-development biodiversity value.

Whether the description of the habitat as “remaining scrub” within the ecological submissions and consultation responses accurately reflects the extent and condition of the vegetation present immediately prior to the flailing works undertaken on 4 August 2025.

I would also ask the Council to confirm whether it is satisfied that the biodiversity information submitted with this application accurately reflects the condition, extent and ecological value of the habitats present on the site prior to the vegetation clearance activities.

Furthermore, the Ecological Impact Assessment states that the site lies within the SSSI Impact Risk Zone for Beeding Hill to Newtimber Hill SSSI and specifically notes that Natural England should be consulted. To date, I have been unable to locate any consultation response from Natural England within the planning documentation. I would therefore be grateful if the Council could confirm whether such consultation has been undertaken and, if so, where the response can be found.

I respectfully request that these matters are carefully reviewed before any planning decision is made

Yours faithfully



Oxcroft
Church Farm Walk

Below are two photos taken by myself on August 4 2025

One photo...extract from Eco Co Op report upon which they based the entirety of their Ecology and Biodiversity Reports

Steining - Upper Beeding

4 August 2025 16:24

Pre existing 4/5 ft High Vegetation

Level of Flailed Land

Steyning - Upper Beeding

4 August 2025 16:23

Height of vegetation prior to flailing





Photograph 1. View across the northern section of the site.



Photograph 2. Blackthorn scrub boundary of the site.



Sent from my iPad