
Sent: 22 February 2026 23:05
To: Planning
Subject: DC/25/2114 + 2 photo attachments
Categories: Comments Received

Dear Mr Holmes

Whilst the formal consultation period closed on 19 February, this submission is not intended as a further objection but rather to assist the Council's consideration of the application. Having carefully re-read the Ecology Report prepared by Eco Co-Op and the only recent showing of The Ecology Response submitted by Place Services (due to this not showing on the site for a couple of days) I have noticed what appears to be a discrepancy within these documents and felt it important to draw this to your attention as shown below...

Eco Co Op claim that....

*The existing bramble scrub and blackthorn scrub is infrequently managed, with an approximately annual cut back.
It was subject to a full cut in 2021 due to the need for tree maintenance onsite.*

The Ecology Response (Place Services, Essex County Council, claims 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."*

This is factually incorrect. No dense bramble scrub was removed between 2021 or 'managed' in any shape or form..... and until August 4th 2025it is highly misleading to say that and the **remaining** scrub had been recently flailed....this was fully regrown vegetation at chest height.

The statement relied on third-party information rather than direct observation and does not reflect the true site conditions.

As a resident living in immediate proximity to the site, with direct and regular views of the land over a number of years, I have observed the condition or if there were any management of the bramble and blackthorn scrub throughout multiple seasons. The field was flailed in 2021 and, to my knowledge and observation, remained unmanaged thereafter until a further flailing that took place on 4th August 2025.

This does not accord with the Ecology Report's statement that the scrub is subject to approximately annual management and neither was there any need for tree maintenance other than two trees tight to the far east boundary whereby there were no other trees on the site.

Instead, the vegetation has developed as dense, undisturbed scrub consistent with extended periods of natural growth rather than routine cutting.

This discrepancy suggests that the baseline habitat condition may not have been accurately represented not to mention a full clearance of the entire field one week prior to Eco Co Ops survey and therefore the ecological conclusions and proposed mitigation measures should be reviewed to ensure they are founded upon an accurate understanding of the site.

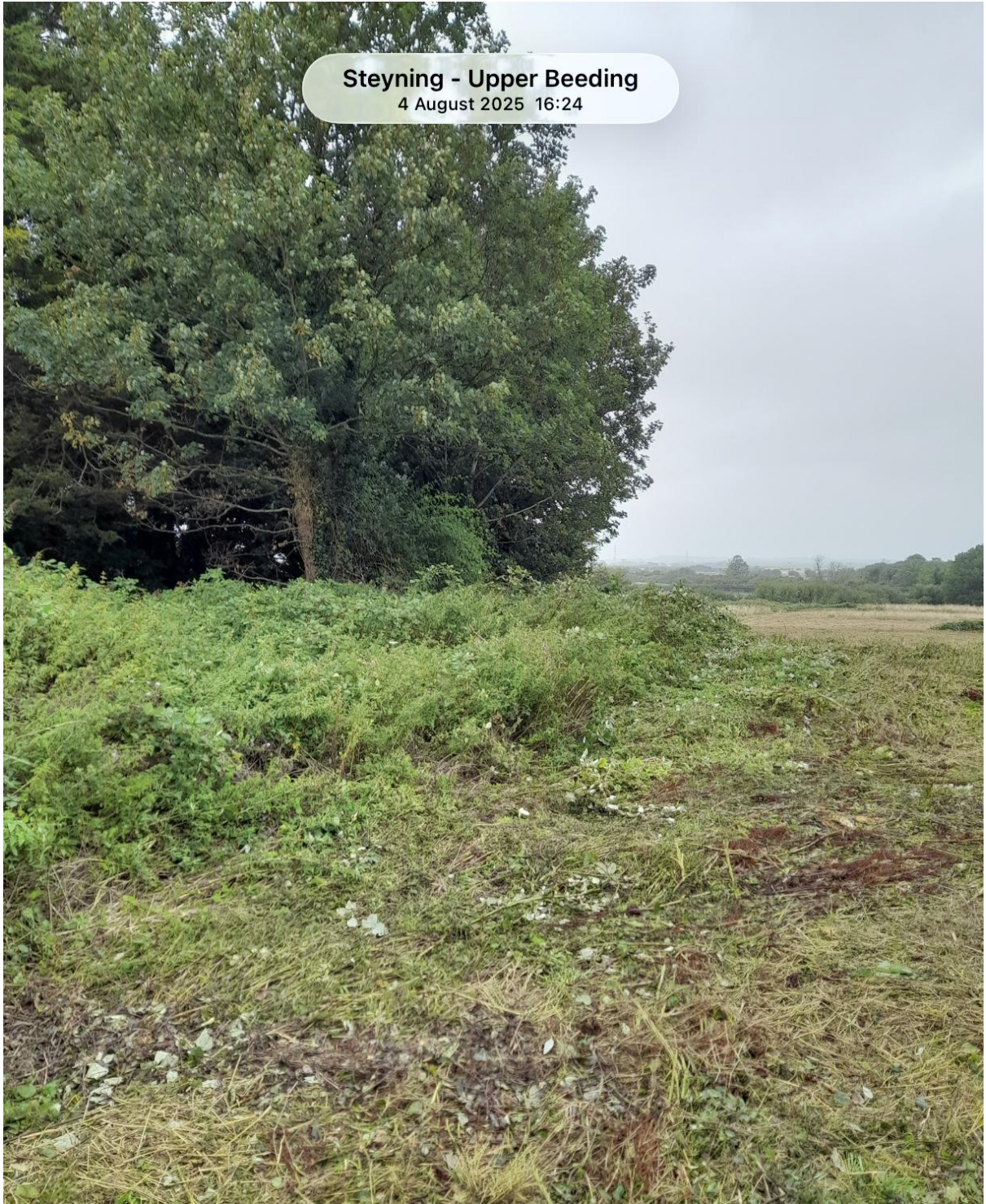
Steyping - Upper Beeding
4 August 2025 16:23

Height of vegetation prior to flailing



Steyping - Upper Beeding

4 August 2025 16:24



Place Service state....

We note from the Ecological Impact Assessment (The Ecology Co-op, December 2025) that there are no buildings onsite and it appears from the Arboricultural Impact Assessment (Arbortrack Systems Ltd., December 2025) that the only trees to be removed are G19 (Blackthorn) and Tree 18 (Elder). As neither of these would contain Potential Roost Features for bats, we agree that no further surveys for bats are required.

The conclusion in the Ecological and Arboricultural Impact Assessments (December 2025) that no further bat surveys are required. This is incorrect and potentially illegal.

Eco Co Op has recorded 12 bat species, including the rare Barbastelle bat. Even trees without obvious features may provide roosting opportunities, particularly for Barbastelle bats, which use small cracks, loose bark, or ivy. To suggest that no further bat surveys are required risks the disturbance of protected species and contravening UK wildlife law.

Place Services state....

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Impact Assessment (The Ecology Co-op, December 2025)) to avoid impacts from light disturbance. This should be secured by a condition of any consent and implemented in full. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely to be present within the local area. This should summarise the following measures recommended by [Guidance Note:08/23 \(Institute of Lighting Professionals\)](#) will be implemented

The Bat Conservation Trust clearly states that any lighting within a natural dark area will disturb Barbastelle bats which have been recorded within this field and previously in 2022 including the Serotine bat which is classed as Vulnerable.

Barbastelles in particular avoid illuminated areas, particularly along commuting and foraging routes, and are more sensitive to artificial light than many other bats. Even low-level light spill from houses, security lights, or car headlights could discourage them from using areas they currently rely on. While the developer may attempt to mitigate with low-level lighting initially, once residents occupy the site, uncontrolled light sources—such as garden lights, house lights, security lighting, and vehicle

headlights—will inevitably flood the area, undermining mitigation and causing long-term disturbance to this rare species.

Immediate action is required to ensure compliance with UK wildlife law and best ecological practice.

I trust this information is helpful to the Council's consideration of the application

[REDACTED]

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