
Sent:

23 March 2026 10:56

To:

Planning

Subject:

Planning Application DC/25/2114

Categories:

Comments Received

Dear Mr. Holmes

I write to raise a concern regarding the report by ECE planning which includes the statement that “all the Biodiversity Net Gain (BNG) calculations have been updated to align with the revised landscape proposals, ensuring a consistent and robust approach.”

This statement does not address the fundamental issue that the site, including areas now identified for biodiversity enhancement, had been flail-cut on August 4th immediately prior to the ecological survey on August 11th 2025.

Scrub habitat is widely recognised as being of significant ecological value, providing nectar, fruits, seeds, shelter, and vital breeding and roosting sites for a wide range of species. In particular, bramble and other scrub species support invertebrates, birds, mammals, amphibians and reptiles, forming an important transitional habitat between grassland and woodland which exactly describes (described) the land on Church Farm which includes the all important foraging grounds for the Barbaselle bat which has been recorded within this area .

The removal of such habitat prior to survey would therefore risk overlooking a substantial component of the site’s biodiversity and undermining any accurate assessment of its true ecological value.

It is particularly concerning that Fairfax appear to be claiming this same area, which had already been rich in biodiversity, as the site where they intend to achieve their 10% biodiversity net gain. Presenting pre-existing, cleared habitat as an opportunity for biodiversity gain is not consistent with the principles of the Environment Act 2021 and raises serious questions about the reliability of the submitted BNG calculations.

I therefore request that the Council seek clarification as to how the pre-clearance biodiversity value of the site has been properly assessed and evidenced, and how the current BNG figures can be considered robust and compliant given the prior clearance.

Regards

[REDACTED]

Oxcroft

Church Farm Walk

Upper Beeding

Sent from my iPad