

From: Planning@horsham.gov.uk
Sent: 19 June 2026 12:05
To: Planning
Subject: Comments for Planning Application DC/25/2114
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 19/06/2026 12:04 PM.

Application Summary

Address:	Land at 519396 111237 Church Farm Walk Upper Beeding West Sussex
Proposal:	Erection of 4 No. detached dwellings with associated amenity space, car parking spaces, detached carports, access road and other associated infrastructure.
Case Officer:	Daniel Holmes

[Click for further information](#)

Customer Details

Address:	Meadow View Church Farm Walk Upper Beeding
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Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Other
Comments:	Dear Planning Authorities I wish to draw attention to an important ecological consideration regarding the interpretation of Barbastelle bat activity and subsequent surveys recorded at Church Farm where extensive bramble scrub habitat had been removed to ground level by the landowner on 4 August 2025. As we know the removal of vegetation with the purpose of setting the site aside for surveys leading to development application. The field had previously contained extensive bramble scrub with varied plant species, ideal habitat for harbouring moths and other insects favoured by foraging Barbastelle bats. The removal of this vegetation would have significantly altered both the structure of the habitat and the abundance and distribution of insect prey available within it. The loss of habitat immediately prior to survey work raises important questions regarding the interpretation of subsequent bat activity.

Importantly, the Eco Co-Op Environmental Impact Assessment dated 10 December 2025 records on page 21, within the Bat Activity Survey, that both Barbastelle and Serotine bats were recorded within the survey area and were assessed as commuting through the site. Given the conservation importance of these species and their recognised dependence upon connected habitats and productive foraging resources, it is necessary to consider whether this interpretation reflects the circumstances present at the time of the survey.

The extensive bramble scrub habitat removed on 4 August 2025 would have provided valuable insect-rich foraging habitat, particularly for moth-feeding species such as the Barbastelle. Consequently, bat activity recorded only weeks after the loss of this habitat may not simply indicate routine commuting behaviour but could also reflect bats responding to the sudden removal of a significant feeding resource, including exploratory movements and searching behaviour for alternative foraging opportunities within the surrounding landscape.

The Bat Conservation Trust and Natural England guidance recognise that recent habitat alteration can influence bat behaviour and therefore affect survey outcomes and their interpretation. Surveys should seek to understand how bats are using habitats in their current condition and should take account of any recent habitat loss or degradation that may have altered normal patterns of bat activity. Consequently, bat activity recorded only two months after the removal of vegetation would not represent typical baseline behaviour.

Natural England guidance recognises that commuting routes and foraging areas can be critical to the conservation status of bats and that habitat loss or deterioration may adversely affect bats even where no roost is directly impacted.

The Barbastelle bat is recognised as one of Britain's rarest and most conservation-sensitive bat species. The Bat Conservation Trust identifies the species as being particularly vulnerable to habitat fragmentation and the loss of woodland edges, hedgerows, scrub habitats and other insect-rich feeding areas. Serotine bats are similarly dependent upon connected landscapes and productive foraging habitats that support abundant insect populations. Both bat species documented at this location by Eco Co Op, The Sussex Bat Group, and independent surveys undertaken by myself.

It is therefore important to recognise that the presence of Barbastelle activity recorded following habitat loss and subsequent insect impact cannot automatically be interpreted as evidence of routine behaviour.

In light of the apparent potential misinterpretation concerning bat activity, and given that the adequacy of the proposed lighting mitigation measures has already been challenged in several representations submitted to the Council, I respectfully suggest that the ecological evidence provided by Eco Co Ops should be regarded as unreliable. In my view, the inconsistencies identified call into question the accuracy and robustness of their findings, and I therefore submit that neither the Eco Co Ops report nor its conclusions should be accepted by Place Services as a sufficiently accurate or reliable basis upon which to assess the ecological impacts of this application.

In view of the above, I respectfully ask the Council and Place Services to clearly explain how the proposed construction of a relatively small number of dwellings can be justified when weighed against the permanent loss and degradation of habitat supporting protected and ecologically significant species. The available evidence demonstrates that this site forms part of a valuable and interconnected wildlife habitat utilised by Barbastelle and Serotine bats, together with a wide range of other protected and declining species. Once this habitat is lost, it cannot simply be recreated elsewhere within a meaningful ecological timescale.

I therefore ask that the Council demonstrates how this proposal satisfies its statutory duties to conserve biodiversity and protected species, and how the limited benefit of additional housing can reasonably outweigh the irreversible damage that would be caused to a site of such recognised ecological value.

Yours sincerely



Kind regards

Telephone:

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