



Stockmans Barn

Church Farm Walk

Upper Beeding

BN443HD



DC/25/2114

In reference to:

Ecological Addendum REDACTED (04.06.26)

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=D5543A67F6D64C758572B1E960D2A593

In the Ecology Co-op's Addendum Report it states:

Ecology Co-op

Ref: DC/25/2114 – Ecology Addendum 4th June 2026

'The biodiversity metric produced by the Ecology Co-op has taken the baseline value of the site as entirely comprising of bramble scrub habitat. The baseline has been set using the highest habitat value present on site since 2020, consistent with the requirements of the Environment Act 2021, ensuring no under-recording of biodiversity value.'

In CSA Environmental's report from March 2022 the following image of the site taken **14/07/2021** shows the habitats present on-site prior to site clearance in early October 2021.

The site can clearly be seen to be composed of a large area of mixed scrub, where other larger scrub species have established standing well above the bramble scrub surrounding them. This area is a valuable habitat for breeding and nesting birds.

CSA Environmental - Landscape and Visual Impact Assessment

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=30B6EFD337459C915B3AE979B59D84

Visualisation Type 1
 Cylindrical projection
 48% @ A3, 96% @ A1
 14.07.2021, 10:22
 Canon 450D 1.6x, Canon EF-S 18-55mm
 Hfov 76°
 Looking direction: South west

		Dixies Barns, High Street, Ashwell, Hertfordshire SG7 5NT † 01462 743647 e ashwell@csaenvironmental.co.uk w csaenvironmental.co.uk		
Project	Land at Church Farm, Upper Beeding	Drawing No. CSA/5627/102		
Drawing Title	Photosheets	Date March 2022		
Client	Fairfax Properties	Drawn HG	Checked CA	Rev -

Approximate
extent of Site

Church of St Peter



Photograph 6

View from public footpath 2776, looking south west towards Site.

Photographs of the mixed scrub habitat on-site:



In the Ecology Co-op's **Interim Ecological Assessment 7th March 2022** the following image is provided.



Photograph 2. A view of the site in October 2021, looking towards the north-east boundary.

It shows the remains of part of this mixed scrub area (seen above) which was cleared/flailed by the landowner during site clearance in early October 2021. The height of the trees present can be seen when the surrounding bramble scrub has been removed.

As mixed scrub has a higher potential habitat value than bramble scrub the assertion by the Ecology Co-op that 'The baseline has been set using the highest habitat value present on site since 2020' cannot be correct.

The images above clearly show that mixed scrub habitat was present on-site prior to site clearance in early October 2021.

This means that at the very least mixed scrub should be the baseline value for the on-site habitat.

Again there are serious concerns regarding the accuracy of the Ecology Co-op's submitted reports.

Why has the Ecology Co-op under-recorded the biodiversity value of the site by not using the highest habitat value present on site since 2020, consistent with the requirements of the Environment Act 2021?

It appears The Ecology Co-op has omitted the evidence of both CSA Environmental's photograph and their own image of the site, both taken in 2021, as they are still describing the on-site habitat as bramble scrub in their Biodiversity Impact Calculation Rev5 08/09/2026.

Biodiversity Impact Calculation

Issue No.: Rev05

Author: [REDACTED]

Reviewer: [REDACTED]

Issue Date: 08/09/2026

Additions/alterations: Amendment of woodland off-site gain

Table 1. Existing habitat conditions for Church Farm.

On-site habitats		Condition Assessments
Bramble scrub (h3d)	Recently cleared/ flailed bramble <i>Rubus fruticosus</i> scrub throughout the site.	N/A



Figure 1. UKHab map showing existing habitats within the site and off site. The site boundary is indicated with a red line and the wider ownership boundary with a blue line. Produced using QGIS software, version 3.44 Solothurn.