

Sent:

16 July 2026 17:53

To:

Planning

Subject:

DC/25/2114 Attachment to follow

Categories:

Comments Received

Application DC/25/2114

Material Concerns Regarding the Ecological Addendum and Biodiversity Net Gain Assessment

Dear Mr Holmes

I write to raise several related concerns regarding the ecological information submitted in support of this application:

- the reliability of the Biodiversity Net Gain (BNG) assessment, including the habitat baseline and the classification of the off-site H3d bramble scrub;
- whether the ecological value of existing habitats, particularly bramble scrub, has been properly assessed against recognised ecological principles and whether the true baseline condition of the site has been accurately represented; and
- whether sufficient weight has been given to the confirmed presence of Barbastelle bats, a rare and legally protected species, and whether the potential impacts of the proposed development have been adequately considered.

1. Reliability of the Biodiversity Net Gain Assessment and Habitat Baseline

Within his Ecology Addendum, Mr Paul Whitby states:

*“I have **total confidence** therefore that the BNG calculations provided within the BIC report are correct.”*

However, there appear to be significant uncertainties as to whether the habitat areas, classifications and baseline conditions used within the Biodiversity Impact Calculation (BIC) accurately reflect the true ecological condition of the site.

This is a fundamental issue because BNG can only be assessed against an accurate pre-development ecological baseline. If the baseline habitat value is incorrect, any claimed biodiversity gain cannot be considered reliable.

The Biodiversity Impact Calculation prepared by The Ecology Co-op identifies the off-site H3d habitat as *“**recently cleared bramble scrub**”*.

Attached photographs raise serious doubt about this description. The evidence indicates that:

- the off-site H3d area has **not** been cleared and remains established mixed scrub habitat rather than recently cleared bramble scrub;
- a drone photograph dated 5 February 2026, taken by a resident whose property directly overlooks the site, shows established mixed scrub vegetation within this area; and
- the habitat visible appears inconsistent with the description of *“recently cleared bramble scrub”*.

Given Mr Whitby’s statement that he has *“**total confidence**”* in the BNG calculations, the Council is respectfully requested to establish:

- how the classification of off-site H3d as *“recently cleared bramble scrub”* was reached;
- whether Mr Whitby independently verified each habitat compartment identified within the BIC against actual site conditions; and
- whether the baseline habitat classification was personally verified or relied upon from the earlier Ecology Co-op assessment.

Even if existing bramble scrub had been removed and subsequently replaced with enhanced habitat, this could not retrospectively create biodiversity uplift. BNG must be assessed against the true ecological baseline condition of the site before any clearance, management or enhancement takes place.

2. Ecological Value of Bramble Scrub and Habitat Management History

Mr Whitby states:

“The value of bramble scrub as a medium distinctiveness habitat is limited – it cannot mature and does not diversify in the way that other scrub habitat types recorded within a biodiversity metric do.”

This statement appears inconsistent with the recognised ecological understanding that scrub value depends on its structure, age and management history.

Natural England recognises scrub habitats, including bramble-dominated scrub, as important wildlife habitat providing food, shelter and breeding opportunities for a wide range of species. Its guidance emphasises that existing habitats should be retained wherever possible and that habitat creation should not normally be relied upon to justify the loss of established habitat.

Natural England also recognises scrub as a dynamic habitat whose ecological value is influenced by its structure, age, condition and management. It highlights the importance of maintaining structural and age diversity, acknowledging that established bramble scrub can provide valuable nesting and shelter opportunities for birds, refuge and connectivity for mammals, reptiles and other wildlife, and essential sources of nectar, pollen and fruit for invertebrates, birds and mammals.

Accordingly, significant disturbance, such as extensive flailing or clearance, can materially alter the habitat's structure, condition and the species it supports. The ecological value of scrub should therefore be assessed on the basis of its actual condition, structural diversity, connectivity and ecological function, rather than being treated simply as habitat that can be removed and replaced.

Claimed “*approximately annual cut back*”

The Ecology Co-op Habitat Management Plan states:

“The existing bramble scrub and blackthorn scrub is infrequently managed, with an approximately annual cut back.”

This statement is disputed by local residents, including residents whose properties directly overlook the field.

The available evidence indicates that between the flailing in October 2021 and the further flailing on 4 August 2025, the site was **not** subject to annual or routine cutting.

The Council should therefore establish:

- **WHO** provided the information regarding an “approximately annual cut back”; and **WHY**
- what evidence supported that claimed management regime; and
- whether this information was independently verified.

If the management history relied upon within the ecological assessment was incorrect, this could have affected habitat condition assessments, habitat classification and consequently the reliability of the BNG assessment.

3. Omission of August 2025 Vegetation Flailing

A further concern is that Mr Whitby’s Ecology Addendum does not appear to acknowledge the extensive flailing undertaken across the site on 4 August 2025, only seven days before the ecological walkover survey commenced on 11 August 2025.

This was a significant site event with the potential to influence habitat structure, vegetation condition, species presence and ecological observations.

Even if the assessor considered that the flailing did not alter the survey conclusions, it should have been acknowledged and its implications considered as part of a transparent ecological assessment.

The absence of any reference to this intervention means the decision-maker may not have been provided with a complete picture of the site conditions at the time of survey.

This is particularly relevant because BNG relies upon an accurate assessment of habitat condition, and recent disturbance can materially affect the apparent ecological character of a habitat.

4. Site Inspection and Verification of Ecological Information

Mr Whitby’s Ecology Addendum and site inspection are both dated 4 June 2026.

Given his statement that he has “*total confidence*” in the BNG assessment, the Council is respectfully requested to establish the extent of his own verification work.

In particular:

- whether all habitat compartments, including the western off-site H3d area, were independently assessed against existing site conditions; and
- whether the conclusions reached were based upon independent verification or primarily upon earlier Ecology Co-op information.

This is important because there appear to be discrepancies between the submitted habitat descriptions and the photographic evidence available from the site.

5. Assessment of Barbastelle Bats

Within the Ecology Addendum, considerable emphasis appears to be placed on the relatively low number of Barbastelle bat recordings obtained during surveys.

However, the ecological significance of confirmed presence should not be discounted simply because recorded numbers were low.

The available evidence shows that:

- Barbastelle bats were recorded during surveys undertaken in 2022 and again in 2025; and
- the species has therefore been confirmed using this area over a three-year period.

The surveys do not demonstrate a lack of ecological importance. Rather, they confirm the presence of one of Britain’s rarest bat species.

The importance of the site for Barbastelles should be assessed in the context of the species’ ecology, habitat requirements and conservation status, not solely by the number of recorded passes.

The Ecology Co-op report itself acknowledges limitations in acoustic detection, stating that bat calls can vary between habitats and that the location of the logger can influence species detection.

Low recorded activity may therefore reflect survey limitations, habitat conditions at the time of survey or the inherent difficulty of detecting this species, rather than demonstrating limited ecological value.

Barbastelles are associated with complex, connected landscapes and rely upon suitable networks of woodland, scrub, hedgerows and other habitat features for commuting and foraging.

Their confirmed presence should therefore be treated as a significant ecological constraint.

6. Impact of Habitat Disturbance and Timing of Bat Surveys

Insufficient consideration appears to have been given to the potential impact of the extensive flailing undertaken on 4 August 2025 before the bat surveys.

Barbastelles are specialist feeders, relying heavily on moths and other night-flying insects. Habitat structure contributes to maintaining insect abundance and suitable foraging conditions.

The removal or substantial reduction of vegetation structure has the potential to affect insect abundance, prey availability, shelter, habitat complexity and the ecological function of the site.

The 2025 bat activity surveys were undertaken between 4 and 8 **October** 2025.

The Bat Conservation Trust recognises that the most reliable period for assessing bat activity is generally **between May and September**, when breeding activity and peak foraging behaviour can be assessed.

October is outside this preferred period, particularly for a rare and difficult-to-detect species such as the Barbastelle.

Reliance on low numbers of recordings from an October survey undertaken after significant habitat disturbance should therefore be approached with caution.

Where a rare protected species has already been confirmed, survey limitations should increase the need for precaution rather than reduce the significance of the findings.

7. Lighting Impacts and Future Residential Occupation

Mr Whitby concludes that the proposed sensitive lighting strategy is appropriate.

However, this conclusion relies upon the assumption that lighting impacts can be controlled throughout the lifetime of the development.

Future residential occupation may introduce additional lighting sources, including:

- security lighting;
- garden and patio lighting; and

- vehicle headlights.

These are realistic consequences of residential use and cannot be guaranteed to remain unchanged permanently.

Barbastelles are particularly sensitive to artificial lighting and require dark commuting and foraging corridors. Increased illumination has the potential to affect habitat use and movement.

Reliance on newly planted trees as mitigation also provides limited reassurance, as trees of approximately 3–3.5 metres in height will require many years to mature and provide the structure and connectivity of established habitat.

Conclusion

The ecological evidence confirms the presence of Barbastelle bats on this site in both 2022 and 2025.

The evidence does not demonstrate that the site is of low ecological importance. Rather, it confirms that the site forms part of the habitat network used by a rare and legally protected species.

There also remains significant uncertainty regarding the reliability of the BNG assessment, including:

- the classification and condition of H3d habitat;
- the true ecological baseline;
- the stated habitat management history;
- the omission of the August 2025 vegetation flailing from the Ecology Addendum; and
- whether the ecological baseline has been accurately represented.

These concerns relate to the accuracy, transparency and evidential basis of the ecological assessment.

BNG can only be demonstrated against a reliable baseline. Where uncertainty remains regarding the true condition and ecological value of existing habitats, the assessment cannot be considered robust until those uncertainties have been resolved.

Whilst Mr Whitby concludes that the submitted ecological information is correct and accurate, there remain concerns regarding the reliability of the evidence upon which those conclusions are based.

In particular, the Biodiversity Impact Calculation describes the off-site H3d habitat as “*recently cleared bramble scrub*”, yet photographic evidence indicates that established scrub vegetation remains present within this area.

I therefore respectfully request that these matters are fully investigated and resolved before reliance is placed upon the Ecology Addendum, the Biodiversity Net Gain assessment or the conclusions reached regarding protected species.

Yours faithfully,



Oxcroft

Church Farm Walk

Attachment to follow

Sent from my iPad



Church Farm, Upper Beeding – BIODIVERSITY IMPACT CALCULATION



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
Off-site habitats		Condition Assessments
Blackthorn scrub (h3a)	One stand of blackthorn <i>Prunus spinosa</i> scrub bordering the northeastern corner of the site.	Poor
Bramble Scrub (h3d)	Recently cleared/ flailed bramble <i>Rubus fruticosus</i> scrub west of the site.	N/A
Modified Grassland	Rye grass <i>Lolium perenne</i> and Yorkshire fogg dominant <i>Holcus lanatus</i> , with some scattered scrub	Poor

Photo submitted by CSA environmental...March 2022
showing western off-site hd3

St. Peter's Church

Entrance to site
Church Farm Walk

Western off-site hd3
Mixed scrub



Three photos to show that
 Western side.....Off - site area hd3 has NOT been recently cleared /flailed
 Bramble scrub
 This area off-site hd3 has been **claimed** within The Eco Co Op as an area
 for BNG
 This is an **existing** nature rich area of existing area of Mixed scrub Habitat

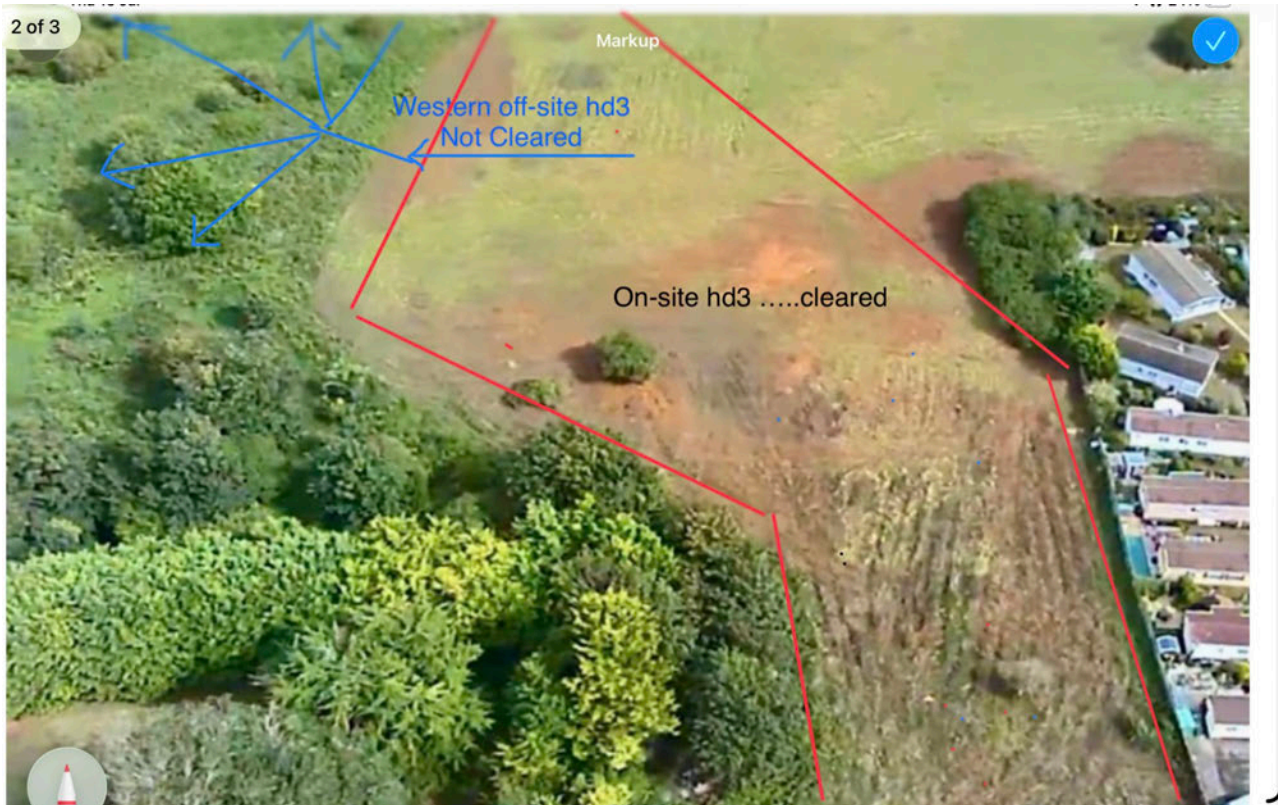




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 Oxcroft
 Church Farm Walk