

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 06 February 2026 18:32:13 UTC+00:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DC/25/2057
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 06/02/2026 6:32 PM.

Application Summary

Address:	Land North of Little Slaughterford Chapel Road Barns Green West Sussex
Proposal:	Proposed development of 68 dwellings with vehicular and pedestrian accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works, and works to existing culverted watercourse on site.
Case Officer:	Alice Johnson

[Click for further information](#)

Customer Details

Address:	30 Finians Field Barns Green Horsham
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Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Highway Access and Parking - Loss of General Amenity - Other - Overdevelopment - Trees and Landscaping
Comments:	Objection regarding development DC/25/2057 Proposed development of 68 dwellings with vehicular and pedestrian

accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works, and works to existing culverted watercourse on site. Land North of Little Slaughterford Chapel Road Barns Green West Sussex

1. Climate, Sustainability and Natural Environment

1.0 Environmental and Ecological Considerations:

1.1. Removal of H1:

The Eastern boundary hedgerow is noted for removal in its entirety to allow for construction works and sight lines in Miller Homes planning statement. The removal of the hedgerow in question is excessive, in part or wholly, and would result in a detrimental, and significant loss of rural village character, visual amenity and further the erosion of the natural environment, undermining the wildlife corridor network of Barns Green, vital for healthy ecosystem functioning, including soil structure, function and water retention. Its removal would have a deleterious impact for a plethora of important wildlife species as it provides wildlife with free-movement across the landscape, provides vital year-round refuge and sequential food resources throughout the year. It supports nationally and locally important species: invertebrates including the brown hairstreak butterfly (Under Section 41 of the NERC Act in England it is a species of principal importance and a Priority Species under the UK Post-2010 Biodiversity Framework), potential arboreal dormouse activity, breeding and roosting bird species, including red listed starlings (for which no ornithological surveys have yet been conducted for the site which are necessary). It is a part of a wider navigational network and foraging area for important bat species, including nationally important and protected Brown long eared and Barbastelle bats, as mentioned in the Bat Survey Report. Of which all are protected under the Wildlife and Countryside Act, 1981, are both priority Species under the UK Post-2010 Biodiversity Framework and both are also European Protected Species (EPS) under Annex IV of the European Habitats Directive.

Under the Hedgerow Regulations 1997 criteria all hedgerows, including the eastern hedgerow to be removed in its entirety is considered "Protected" and "Important". The eastern (H1) hedgerow is over 90 metres in length with a gap less than 20metres, it is land used for agricultural purposes (whose definition includes the use for grazing cattle) and lies within a European protected site (Special Area of Conservation- SAC). It is also a hedgerow over 30 years old, unfortunately picture 1 (see below) has no accompanying date but based upon the dress and style represented in the photograph, it could be estimated to be pre-WW2 and is present in Aerial photography Supplied by Natural England, taken by the RAF in 1959 (picture 2). The hedgerow field boundary is potentially indicated in map 1 (see below), dating between 1877-1880, the OS map indicates

probable cause for "important" hedgerow status under the Hedgerow regulations 1997 and believe its importance both historically and biologically should be considered, and the retainment of this important feature, in its entirety, for both landscape character and habitat provisioning should be secured via a hedgerow retention order under the Hedgerow Regulations 1997. Especially as the continued expansion of urban areas within the area and nationally continue to exacerbate the decline in the natural environment, with a current estimated loss of 118,00 miles of hedgerows since 1950.

Picture 1. The village store at Barns Green, Sussex identifying the presence of the eastern boundary hedge (H1) along Chapel Road that is earmarked for removal. (Available at: Gallery - Itchingfield Parish Council).

Picture 2. Aerial Photo - raf_58_2862_f43_0067, an enlarged image of the proposed development site taken by the RAF, dated 1959, identifying the existence of the eastern boundary hedgerow (H1) along chapel lane (Original Available at: Aerial Photo | Historic England and https://historicengland.org.uk/images-books/archive/collections/aerial-photos/record/raf_58_2862_f43_0067).

Map 1. An 1877-1880 Ordnance Survey map identifying potential old wood pasture habitat within the current location of Land south of Smugglers Lane proposed development plot, along with residual hedgerow (H1) along chapel road (Original map available at: <https://www.british-history.ac.uk/os-1-to-10560/sussex/024>).

As a part of The Men's wider SAC (Special Area of Conservation) designation, as identified by the EIA (Ecological Impact Assessment) and Bat report, due to the presence of vulnerable bat species, the area thus also falls under the South Downs National Park local plan and appropriate habitat assessments undertaken in line with their own stipulations, inline with the EIA recommendations:

- 3.2. It is therefore considered that an assessment of the likely impacts of this development on these sites is undertaken. These areas are protected by the Habitats Directive (EC Directive 92/43/EEC on the Conservation of Natural and Semi-Natural Habitats and of Wild Fauna and Flora) and the Habitats Regulations (The Conservation (Natural Habitats &c.) Regulations 1994).

The NPPF also identifies that:

- 194. The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation;
 - 195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has
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concluded that the plan or project will not adversely affect the integrity of the habitats site.

As stated in 3.5 of the EIA, which also corresponds with the Itchingfield Neighborhood plan sentiments regarding biodiversity and urban development, serious consideration needs to be given to the viability, efficacy and sustainability of the site. Particularly taking into consideration the current development at Sumners Field where currently only 6 dwellings have been sold, and the future proposal for land north of Smugglers lane to be developed; there is currently an over-application for non-essential development in the village that will permanently have a negative effect upon the historical character of the village, both aesthetically and materially, especially when current services and infrastructure already fail to meet current village needs.

Also, whether the long-term anthropogenic impacts of increased light, noise and air pollution, loss of natural flood defenses in the form of a water retentive field network, along with the encroachment and erosion of the natural environment will have on biodiversity, protected species and important habitats, including hedgerows and ancient woodland areas that naturally occur with increased human activities.

- 3.5. The Habitats Directive applies a precautionary approach to protected areas and as such plans and projects can only be permitted once it is ascertained that there will be no adverse effect on the integrity of the site(s) in question. Projects may be granted permission if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI), such as large infrastructure development proposals etc. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Amongst the planning portal documentation for this proposed development here are also at least 2 different landscaping plans for the proposed development, as seen in in HMMP and the landscaping plan documentation plan reflecting different aspects of a new hedgerow to eventually replace the removed H1:

- The landscape document plan does not provide a complete wildlife corridor that would reconnect the north and southern hedgerow boundaries due to no longer linking with the northern hedgerow and a large gap to allow for the new road layout; this presents an issue for arboreal creatures that prefer and are adapted to moving around within hedgerow and canopy environments, and are often reluctant or are known to not travel over open ground. Currently the only gap in H1 is a metal gateway and log, but this still presents wildlife with a short aerial pathway connecting the hedgerow network.

- The HMMP document plan identifies that the hedgerow would link with the northern boundary hedgerow and the southern boundary hedgerow and would be disrupted by a singular road. Arboreal pathways could be retained by creating an artificial arboreal habitat corridor or by retaining the original eastern hedgerow (H1).

1.2. Removal of part of H2:

Regarding the proposal placed by Miller homes, there are inconsistencies between planning materials and Miller Homes own planning statement document supplied to the portal.

Both the planning statement and all relevant ecological and landscaping reports state that the only hedge to be removed (In whole or part) is H1, the eastern boundary hedge line, and that all remaining hedgerow and ancient woodland boundaries will remain intact and untouched, as mentioned in the landscape management plan, Planning statement, HMMP, PEA, EIA, BNG management plan and Bat survey report. However, point 4.2 of the arboricultural report supplied by Neil Taylor of Canopy Consultancy states that:

- The following trees will be removed to enable the proposed development:

- o Part of H2 to enable the installation of drainage ditch. to enable the installation of drainage ditch. to enable the construction of a site access, installation of new drainage and to allow for mandatory sightlines for the new site entrance. A replacement hedge will be planted as part of a landscape scheme for the site. installation of drainage ditch.

Currently, no documentation other than this brief note in the arboricultural report mentions removal of part of H2, the northern boundary hedgerow. If the proposal in the Planning Statement application document, landscape and site plans to install/reinstate the front boundary ditch involves the removal of part of H2, amendments must be made to the planning statement proposal and all relevant ecological reports, including BNG and the HMMP, and an application must be made in writing including the amount of hedgerow 2 to be removed. The exact amount of H2 to be removed needs to be stated and it needs to be identified in the ecological reports, including BNG and HMMP with detailed plans of mitigation and BNG enhancements to replace and enrich this section of hedgerow.

As a species rich hedgerow, historically present within the landscape with available OS maps from 1875 identifying the existence of the woody lined trackway along with the current field systems, indicating that the field outlined for development also contained mature open-pasture trees, bringing to light a possible previously unidentified historical wood-pasture habitat that would benefit from protection, retention and restoration. This would bolster and future proof the surrounding ancient woodland habitats and important hedgerow corridors against increasing climate change events, which would improve ecosystem functions for biodiversity and enhance socio-economic benefits for the surrounding communities. The field in question is currently categorized as a network enhancement zone 2 under the DEFRA Magic Maps, identified land that connects existing patches or fragmented habitats and would be suitable to use for improving

local biodiversity through appropriate conservation management or used for green infrastructure provisioning.

1.3. Lack of a Habitat Management and Maintenance Plan:
The Planning Statement (incorporating Affordable Housing Statement and draft S106 Heads of Terms) and Habitat Management and Maintenance Plan (HMMP) documents both identify that this HMMP document is an interim piece of evidence:

- Statement from Planning Statement (incorporating Affordable Housing Statement and draft S106 Heads of Terms)

- o 8.25. In addition, an outline HMMP has been provided which summarises how the net gains in biodiversity on site can be delivered. A final detailed HMMP will be submitted to support the information required for the mandatory BNG condition.

- Evidence from the Biodiversity Net Gain Feasibility Assessment & Outline Habitat Management and Monitoring Plan (HMMP) document

- o 2.11. It should be noted that detailed landscaping will be developed as part of approval conditions. As such, this assessment would need to be revised once landscaping has been finalised.

- o 3.0. Outline Habitat Management & Monitoring Plan (HMMP)

- o 3.1. A full HMMP will be developed at the detailed design stage to detail the long-term management of the proposed habitats to achieve the targeted habitat conditions, over a 30 year timespan. An outline version of this HMMP is presented below to aid in the determination of this application.

- o

The importance of the HMMP cannot be stressed enough, with current failings of BNG and Green Infrastructure (GI) requirements in the Sumners Fields development, the HMMP needs to not be a planning condition which can later be reneged on or altered, but a full HMMP needs to be drawn up, agreed upon and put in place before any permissions are given, even retrospectively, to ensure the integrity, sustainability and future persistence of current habitats and wildlife. The HMMP should be evidence of what they MUST DO, not what they could do, this is especially important when regarding Miller Homes own wording in the Planning statement states "how the net gains in biodiversity can be delivered" and not will be delivered:

- Planning statement 8.25: In addition, an outline HMMP has been provided which summarises how the net gains in biodiversity on site can be delivered. A final detailed HMMP will be submitted to support the information required for the mandatory BNG condition. This could effectively make the premise of the outline HMMP void and any future HMMP could fall exceedingly short of the current ecology professionals recommendations. Thus, a full and final HMMP should be submitted and approved prior to any consent being given.

Planning conditions should be used sparingly, something as important as the HMMP should be agreed upon prior to any consent due to the potential impotency in enforcing and agreeing upon planning conditions.

1.4. Ancient Woodland Buffer Inconsistencies and Worries of Overspill

The woodland buffer zone of 15 meters demonstrated in the landscape plans and the Planning statement does not correspond with the HMMP supplied by the ecological professionals, stating that a 20-meter buffer shall be created. This is concerning, because the HMMP, by Miller Homes own admission is provisional HMMP, iterating what could be done and not will be done. It appears, on paper, that Miller Homes are already trying to reduce the ecological professional guidance regarding habitat creation, enhancement and BNG offsetting before permission has even been granted.

The provision of a 20-meter buffer instead of 15 meters would significantly reduce the anthropogenic impacts associated with the development processes, while allowing for suitable woodland edge habitat restoration to provide long-term benefits for both flora and fauna. Bolstering the ancient woodland edge habitat would therefore also enhance soil structure and health, and a diverse native species mix would ensure the habitat is robust and has the ability to adapt and tolerate future environmental and anthropogenic stressors.

There is also concern regarding the proximity of the new road layout to the woodland edge buffer zone. The concern is that the road layout will require a significantly wider area to be excavated to allow for services and footings/road edge development, this spill over into the buffer area should be avoided at all possible costs to preserve the soil structure, soil biota and any woodland flora in the soil seedbank and fibrous rooting for the mature trees along this ancient woodland edge habitat. A greater woodland edge buffer would also aid to mitigate the immediate increase in air pollution from development and post-development traffic.

1.5. Dormice

Due to their protected status and drastic declines, monitoring hazel dormice is important in understanding how anthropogenic influences and environmental changes impact the species, helping inform conservation efforts in a bid to halt further decline. Not only is monitoring important to ascertain presence within a given habitat but also population estimates, it can be extremely difficult to monitor the species due to their nocturnal arboreal behaviour and energy reserving sleep tactics (Bullion and Looser, 2018).

The dormouse survey utilizing nest tubes (NT) identified no use of nesting tubes by and small mammals or birds from May-

September 2025. However, the absence of data does not determine true absence of the species. It is also historical evidenced within the Itchingfield county of dormouse presence, including a recording by a PTES (people's Trust for Endangered Species) dormouse survey volunteer on 05/07/2025 (Record available on the National Biodiversity Atlas website- occurrence record PTES49063). It must also be noted that the Sussex Dormouse Group have been inactive for a number of years, meaning a significant gap in available data regarding the wider Sussex County's Dormouse population numbers, including areas of activity. The use of footprint tunnels alongside the nest tubes would have helped produce a more accurate representation of *Muscardinus avellenarius* use of the hedgerows, also mentioned on their website a useful tool during the survey season, for which they did not utilise.

Nest tubes (NT) are not normally used by breeding individuals and not best suited to long-term population monitoring like nest boxes (NB), but are considered a valuable tool for short-term surveys to assess presence/absence on a site (Bright et al, 2006; Chanin and Gubert, 2011; Combe, 2018; Lang et al, 2018). Though finding dormice is not always plain sailing as they do not always occupy the NB and TB provided, there can be periods where activity is virtually absent (Bullion and Looser, 2018; Melcore et al, 2020). Availability of suitable shrub habitat can provide natural nesting sites, while temperatures reaching and exceeding 30°C during hotter summer months over the past decade could be raising internal box temperatures to intolerable ranges for the species (Bright et al, 2006; Chanin and Gubert, 2011; Juskaitis, 2014; Morris, 2004; Panchetti et al, 2004; Walhovd and Jensen, 1976).

Chanin and Wood (2003) further confirmed the extent to which both devices can fail to provide confirmation of presence; they discovered dormice were going undetected during the entire survey season, even though they were known to be present on study sites that yielded a negative presence for the year (Chanin and Wood, 2003; Bullion et al, 2021). Indicating that it does not necessarily mean a site is absent of dormice and more than one season utilising other survey methods should be required to aid confirmation of dormouse presence/absence (Chanin and Wood, 2003; Chanin and Gubert, 2011; Bullion et al, 2021).

This is particularly important, as nest tubes are frequently employed to detect absence or presence of dormice for consultancy and development purposes, being a cheap and easy approach to surveying (Chanin and Gubert, 2011; Bright et al, 2006), if a true presence/absence cannot be guaranteed through nest tube use (Bullion et al, 2021; Chanin and Wood, 2003), other methods need to be deployed alongside or alternatives developed to discern true presence/absence of *Muscardinus avellenarius* on any given site.

Pilot studies (Bullion and Looser, 2018; Bullion et al, 2018) tested the efficacy of tunnels against boxes and tubes during a controlled study in Suffolk, with 50 tunnels, 50 boxes and 50 tubes deployed

at each of the 12 locations for the survey season between April and November (Bullion and Looser, 2018; Bullion et al, 2018). The pilot study displayed the effectiveness of Foot print tunnels (FPT) for dormouse detection during a single survey season; FPT had a detection rate of 28% between April-November, Nest Boxes detection rate was 2% and Nest Tube rate was 3% (Bullion et al, 2018; Bullion and Looser, 2018). This resulted in FPT having a 97.5% chance of detecting dormice during a 3-month period between May and October with 50 tunnels, even if they are living at low densities (Bullion et al, 2018; Bullion and Looser, 2019). While Melcore et al (2020) FPT study also supports this devices' out performance of both nest boxes and nest tubes after proving to be the only method to successfully detect dormice (Buchner et al, 2023; Hunt, 2023; Melcore et al, 2020).

There is no certainty that absence of evidence in tubes and boxes is an absence of dormice in that habitat, but to achieve 95% probability of detection with NT and NB, ideally 50 devices are required per site to be surveyed over several months and it can take weeks or months before they are used (Chanin and Wood, 2003; Chanin and Gubert, 2011; Priestley et al, 2021). Nest tube detection success is also tied to population densities, low density sites potentially have a 78% chance of success, indicating a higher chance of failure in detecting dormice, even though they may be present, as already identified by Melcore et al (2020) and Chanin and Woods (2003); whereas FPT still have a 95% probability of detection even when species are living at low densities (Bullion et al, 2018; Bullion et al, 2021; Chanin and Wood, 2003; Chanin and Gubert, 2011; Priestley et al, 2021).

1.6. Edna and pond surveys

The GCN (Great Crested Newt) sampling from small a single small pond located to the north west of the field provided no positive eDNA samples. It is worth noting that this pond is drained routinely by the fisheries to relocate young fish stocks. It should also be noted that around the easement of Betty's lake are 2 permanent wildlife ponds that have not been surveyed or sampled, along with a third located within the woodland surrounding betty's lake (Picture 3). Due to there closer proximity to the field south of smuggler's lane, further ecological surveying is required to rule out the potential for deleterious effects upon local populations of protected amphibian species.

Picture 3. Taken from the eDNS report, identifies the only 2 ponds found by the consultancy, where only one was sampled. The addition of the light blue dots signifies pond habitat areas that have not been yet been surveyed but require surveying for GCN (great Crested Newts).

1.7. Lighting

In line with ecological advice, a lighting plan needs to be agreed upon, prior to any consent to prevent the disturbance to nocturnal

wildlife, mainly the bat species foraging and commuting within and around the location. This is extremely important as light pollution can have a detrimental impact on numerous bat species, particularly barbastelles, brown long eared and other myotis species (e.g. daubenton's), as identified in the Bat Report. These species are specifically adapted to perform natural behaviours in darker environments, avoiding light sources when foraging and navigating the landscape, and emerging when it is full dark. Current survey and mitigation guidelines, and peer reviewed studies outline the negative impacts that light pollution has upon bat populations.

The bat report, PEA and, in particular the EIA should be adhered to in this instance, because it is the only document to specify the mitigation requirements for lighting to avoid unlawful disturbance to bat species:

Bat Report

4.28

The scheme has also been designed for houses to be primarily located away from these flightlines and the implementation of a sensitive lighting scheme across site will maintain these as dark commuting corridors, further minimising the potential for impacts relating to lighting. All construction works must be completed in the daytime when the bats are not active and potential sources of noise/vibration will be positioned away from these features, therefore impacts relating to noise/vibration are considered highly unlikely. These measures are considered to be sufficient to ensure negligible impacts to barbastelle, and other light-averse bats such as myotis species and brown long eared species.

PEA report:

6.7.

The site contains linear habitats and open grassland, providing suitability for foraging and commuting bats. As well as this, the site is within close proximity to The Men's SAC, which is in part designated for barbastelle and Bechstein bats. As such, further surveys are required. It is also recommended that sensitive lighting be used to reduce impacts on nocturnal bat activity.

EIA guidance:

5.0. Assessment of Effects as well as Avoidance and Mitigation Measures

Bats (foraging and commuting)

5.12

Bats (foraging and commuting) The majority of the linear features favoured by bats as flight lines on site, including, species-rich hedgerows with trees, and woodland edge are to be retained and buffered as part of the proposal. This will maintain connectivity of flightlines and foraging habitat across site and the local

landscape. The development would result in the permanent loss of a single species-poor native hedgerow, 115m in length, in the east of the site. In the absence of compensatory commuting habitat this would result in a partial severance of the commuting features on site primarily used by common bat species, and low numbers of rarer bat species such as barbastelle. The 45-70m wide open greenspace in the east of the site will ensure impacts are reduced.

5.13

A sensitive lighting strategy has been prepared (SLR, 2025) to reduce the impact of any artificial lighting on bat commuting and foraging habitat, as recommended within the Bat Activity report (The Ecology Partnership 2025c). The SLR Lighting Impact Assessment confirms that lux levels on boundary habitats pre-curfew will all be below a maximum of 0.55lux at a height of 4m and 0.5lux at 1.5m, with an average of 0.28lux and 0.18lux at 4m and 0.5m respectively. Post curfew lighting is even lower with a max of 0.05lux at 4m and 0.01lux at 1.5m, all below natural moonlight levels (0.05-0.1lux).

5.14

If a sensitive lighting strategy is enacted, this will reduce the impacts on foraging/commuting bats, however, there will still be a residual minor adverse effect on foraging and commuting bats, owing to loss of commuting habitat. As such, further compensatory measures are required.

1.8. Native species:

Throughout all of the ecological and landscape proposals and plans there is a constant mention of native species, but no native species lists (except for a brief mention in the bat report). There is a significant difference in choosing short lived native species and a more varied selection of tree species that would allow a genetically diverse and robust population of woody species that is more capable of adapting to current and future environmental and anthropogenic pressures, including climate change events. A tree planting scheme consisting of *Betula* and *Prunus* species are typically shorter-lived species, but by planting a mix of apex canopy and understory tree species, the green infrastructure aspect of the site would then become more sustainable, be more aesthetically pleasing and would present a significant improvement for site biodiversity. Species including *Quercus robur*, *Carpinus betulus*, *Acer campestre*, *Castanea sativa*, *Coryllus avellana*, *Crataegus monogyna*, *Viburnum lantana* and *Euonymus europeaus* are all examples of varied native tree species already present within the surrounding landscape. I cannot stress how important retaining and enhancing the character of the natural environment in this situation is. Any planting specifications need to be approved prior to development to ensure a robust and sustainable landscape strategy.

2. Overdevelopment and Loss of Amenity:

The proposed development by Miller Homes at Land at Smugglers' Lane, Barns Green, Horsham, signifies an increasing strain upon rural settings to provide unsustainable long-term development and urban sprawl in a countryside setting with limited resources and services. This strain increases pressures upon socio-economic benefits provided by healthy, functioning ecosystems, biodiversity, and soil structures (including water retention and the dampening effects local field systems have upon increasing flood risks; which are set to increase with threat of increasing global warming and climate change issues causing more frequent storm events and intense weather patterns).

- Climate change poses a significant threat to ecological resources (Kumar, 2021; Sandifer and Scott, 2021), in the form of terrestrial and aquatic temperature rises, droughts, flood events, extreme weather and storm events, biodiversity losses, impoverished resources including food and fresh water security (the ability to access and afford safe, nutritious foodstuffs), (Sinay and Carter, 2020; Kumar, 2021; Sandifer and Scott, 2021; C40 Cities, 2018).

- Urban Development on its own creates 70% of the globe's greenhouse emissions, directly contributing to climate change, these Regeneration, expansion and development of cities/urban areas directly affects global biodiversity and natural resources, profoundly causing >80% of natural habitat losses at local scales, with 30,393 species threatened over the next 30 years (Simkin et al, 2022; Chen et al, 2020; Kumar, 2021; Sandifer and Scott, 2021; Africa et al, 2019; Chen et al, 2020; Zhang, 2021).

- Human activities further pollute air, soil and watercourses, for example, waste/sewage management issues contaminate UK waters by 35% and 18% is run-off from cities and roads, negatively impacting natural resources as increased pollution means greater contamination of natural food stocks and drinking water (Institute of Fisheries Management, 2022; Stallard, 2022).
- In Wales and England 38% of edible fish stock health checks fail through diseases caused by water pollutants (Institute of Fisheries Management, 2022).

- Most UK households use 140 litres of water a day but with current climate changes, development and population increases, demand is increasing, not forgetting the demand that the natural environment and biodiversity requires (Institute of Fisheries Management, 2022; Stallard, 2022; Envirotech Online, 2021; Kumar, 2021; Sandifer and Scott, 2021).

The development will further the stresses upon local habitats and ecosystem functioning, resulting in greater footfall patterns along local footpaths, byways and bridleways contributing to erosion and loss of important soils and flora compositions that are characteristic to the rural and ancient woodland character of the area. Further pressures will stem from habitat fragmentation and

deterioration through continued development and lack of conservation management practices.

- There are many facets contributing to biodiversity losses (Keil et al, 2015), major influences affecting biodiversity and ecosystem health are habitat loss and fragmentation (Keil et al, 2015; Wilson et al, 2015). Though the links between habitat loss and fragmentation are not fully understood, there seems to be evidence of delayed time responses or effects between landscape changes and changes in community compositions of birds, and mammals (Semper-Pascual et al, 2021).
- Habitat loss has been shown to increase biodiversity losses, along with species functional diversity when habitats perish inwards, from their edges (Keil et al, 2015).
- It is this habitat loss that has the most consistent negative impact upon biodiversity, directly impacting species abundance, diversity and distribution, while indirectly causing population declines (Jackson and Fahrig, 2013; Donovan and Flather, 2002; Rogan and Lecher Jr, 2018).

These actions directly impact human endeavours to live sustainable lifestyles, or to live less impactful on the environment and live within our means, by contributing to environmental hazards of air and water pollution, flooding, biodiversity losses, and increasing temperatures which reduce available resources (Yang et al, 2021; Brunner, 2012; Chen et al, 2020). Resulting in deleterious effects upon human wellbeing, mental and physical health and reducing access and availability of green spaces (Barton et al, 2017; Yang et al, 2021).

- In England and Wales, Green space in urban areas have been neglected for many years (Chapman, 2022), but NEF (New Economics Foundation) analysis has revealed a greater systemic problem regarding the lack of green space provisioning within the UK planning system, with recent developments having 40% less greenspace than neighbourhoods built in the late 19th-early 20th Century (Chapman, 2022).

Regarding the application, there are a number of inconsistencies, the proposed development does not enhance the cultural or heritage value of the area, nor does it support or enhance services. It effectively creates an isolated community more akin to urban town settlements and whose development process poses a significant threat to the heart of the village community, heavily populated by heritage assets in the form of cottages, forge, village pub and a very necessary village shop and post office, both of which are currently thriving. The encroachment of development not only poses a risk to the structural aspects of the heritage building, but also the viability of continuing business:

- The disturbance of construction traffic and increased parking pressures from the development process will inherently impact the ability of routine deliveries, passing trade and local community use
-

of these current services, bringing into serious question their ability to continue trading under such conditions. Ultimately detracting from and damaging the appeal and, currently, thriving community and economic prospects of the village.

- The proposed development also relies heavily on services it has planned for that are not within the county and are part of the wrong catchment are:

- o Southern Water states that's "Sufficient capacity - Foul There is currently adequate capacity in the local sewerage network to accommodate a foul flow of 0.6 l/s for the above development at manhole reference TQ12265901." It has now been identified that this information is incorrect, the location of TQ12265901 based on Ordnance Survey mapping is Stoke D'Abernon, near Leatherhead, Surrey, over 20 miles away from the location in Barns Green. This assessment should be amended and re-assessed to correctly inform any planning applications before and permissions of consents are given, even retrospectively.

The ineffectiveness of modern development and construction companies to organise and maintain a sustainable development are evidenced within the village at the current Sumners Field site. There have been issues regarding the lack and inability provide sufficient green infrastructure, particularly in keeping with a rural setting.

HDC should ideally be taking into account and supporting the development of brown field sites, as already identified in the adopted Neighbourhood plan and which have already occurred at Sumners fields, and identifying further such sites that don't require the development of agricultural and other green space, and the deleterious effects that accompany such development.

References:

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