

I object to the proposed planning application DC/25/2114 on the basis that it will have a permanent negative impact on many species.

Please look at the wildlife records on iRecord. Most of our records are within: TQ1911.

Off-site area to west - not cleared/flailed:

Please visit the site in person to view the off-site area (to the west of the on-site area, coloured mauve in the site maps) which has been defined by the Ecology Co-op as recently cleared/flailed bramble scrub.

Unlike the on-site area, which has been recently cleared/flailed, the off-site area has NOT been recently cleared/flailed as can be seen in the images.

The Ecology Co-op's incorrect assessment of the off-site area has led to an incorrect value for its condition N/A - Score 1. This has resulted in a flawed value for the Biodiversity Net Gain calculation.



19/10/2025 - Looking south from the footpath that borders the north of the site. In the image above, the location of the on-site western boundary is approximately to the right of the centre of the image. The area to the right of the image (west of the on-site location) is included in the Biodiversity Net Gain calculation as off-site recently cleared/flailed bramble scrub condition N/A.

This area according to the Ecology Coop's ecologist is recently cleared/flailed bramble scrub, condition N/A. As a reference point the tall tree to the left of the image in the distance is the large ancient beech tree near St Peter's church. The area in the centre of the image is in the area the Ecology Co-op have defined as recently cleared/flailed bramble scrub.

Assigning Low Condition Score to Achieve Net Gain:

Does this condition score refer to the condition of the on-site bramble scrub Pre-Clearance or Post Clearance?

[illegible]

Is the Ecology Co-op suggesting that there is no concern or irregularity in clearing a site seven days prior to ecological survey?

Discrepancies in Areas:

In the Ecology Co-op's Habitat Management and Monitoring Plan it states:

"5.2 Scrub Enhancement

5.2.1 Statutory Biodiversity Metric Aims

In order to enhance the 0.28ha of bramble scrub (h3d) to mixed scrub (h3h) in 'moderate' condition...."

Where is the 0.28ha area defined above? This area does not appear to be defined on any of the diagrams the Ecology Co-op has submitted.

In the BNG Metric Calculation Tool this area is defined as 0.53ha.

Can the Ecology Co-op explain this discrepancy?

Also:

In the Ecology Co-op's Habitat Management and Monitoring Plan it states:

"In order create 0.29ha of new mixed scrub 'poor' condition onsite under the Statutory Biodiversity Metric...."

The area defined in the BNG Metric Calculation Tool - A2 Onsite Habitat Creation is 0.029ha of mixed scrub.

It appears this onsite area has been misrepresented by an order of magnitude of 10!

Can the Ecology Co-op give clarity as to the figure used in the actual calculation as it would appear to be incorrect.

These calculations must be scrutinised. It would appear that the Ecology Co-op's calculations cannot be relied upon for accuracy.

Site Clearance:

In the Ecology Co-op's Habitat and Management Monitoring Plan 2026, they appear to suggest that the local council was responsible for site clearance not the land owner. On page 4, it states:

"4.2 Existing Habitat Management

The existing bramble scrub and blackthorn scrub is infrequently managed, with an approximately annual cut back. It was subject to a full cut in 2021 due to the need for tree maintenance onsite..."

The “tree maintenance” referred to above is clarified in the Ecology Co-op’s Ecological Assessment 2022 where they suggest that the local council was ‘partly’ responsible for field clearance due to “tree maintenance”:

"3.2 Habitats

An initial site assessment was attempted on 22nd June but due to access restrictions (the site was densely vegetated with bramble scrub and impassable), the survey was postponed until 12th October 2021. Site clearance took place within the intervening time, in part by the local council at some point across the summer or early autumn to take down a dangerous tree near the site entrance on the boundary with the adjacent church, which has to be felled into the site, whilst much of the remainder of the site was subsequently cleared by the land owner in early October.”

It is not necessary to clear almost an entire field of approximately 3 hectares to maintain one tree next to the access gate.

The tree mentioned here was on the southern boundary of the site near the gate. A small area on this southern boundary was cleared by the council to facilitate the felling of this tree. The rest of the field, approximately 90% or more of the area, was cleared in early October 2021, “by the landowner” according to the Ecology Co-op (see above). This clearance encompassed almost the entirety of the field, well beyond the actual site boundary.

It is concerning that the ecologist who wrote the 2026 report has appeared to infer that the clearance of the entire field was carried out to facilitate the maintenance of a tree that was located next to the entrance of the field.

This is grossly misleading.

Also, the bramble scrub has NEVER been cut annually in the more than twenty years we have lived here. It was cut in 2021 after being left to naturalise for perhaps fifteen years or more.

Who authorised site clearance in 2021 immediately prior to ecological surveying?

Did the Ecology Co-op give clearance for site clearance?

This must be clarified. Who gave instructions to clear the site? When were these instructions issued? Who carried out the clearance?

Were the developers a part of this pre-ecological survey site clearance process?

Did the developers give instructions to clear the site in 2021 and 2025?

Did the Ecology Co-op ask for the site to be cleared in 2021 and 2025?

These questions must be answered satisfactorily. It is not acceptable for such practices to be allowed without accountability.

Inaccuracies in Location:

On page 4 of the Ecology Co-op's Habitat and Monitoring Plan photograph 2b it states: "*distant view looking east from the northwest corner, onsite*".

This view is actually a distant view looking west from the northeast corner onsite. The reason this matters is because the calculations to achieve Biodiversity Net Gain are based on the locations and conditions of the habitats.

Contradictions in Dates:

In the Ecology Co-op's Ecological Impact Assessment 2025 it states that a Preliminary Ecological Appraisal was conducted in May 2025.

Also in the Ecology Co-op's Ecological Impact Assessment 2025 it states that a Preliminary Ecological Appraisal was conducted in August 2025.

Missing survey Data:

What was the nature of this May appraisal?

Was the site visited by the Ecology Co-op in May 2025? Did the Ecology Co-op take photos of the site in May 2025? If so, can the Ecology Co-op provide us with their photographic evidence and data from their May appraisal pre-clearance? The current data they have provided is from their August 11th preliminary survey which is post felling of the field.

Misleading Diagrams:

Figure 7 of the Ecology Co-op's Ecological Impact Assessment 2025 report, which shows the priority habitats on-site, appears to have been highly inaccurately drafted. It doesn't give an accurate reflection of the actual relationship of the priority woodland habitat to the proposed development site; it also appears to have been taken from the previous application's 2022 report as the footprint is not consistent with the 2025 proposal leading to misinterpretations.

Avoiding Priority Habitats On-Site to Achieve Net Gain:

The Ecology Co-op lists the habitats present on the site as bramble scrub, blackthorn scrub, and a single sycamore tree. This can be seen in figure 6 of their Ecological Impact Assessment 2025.

The scrub habitats are listed as part of the Ecology Co-op's Biodiversity Net Gain calculation. However, the sycamore does not appear to have been included in the actual calculation.

They draw attention to the high priority woodland habitat to the southwest of the site. This can be seen in figure 7. The true relationship of this woodland to the site is highlighted by the fact that the Ecology Co-op conducted their static bat survey here on the woodland edge. The sycamores here are considerably closer to the centre of the site than the 'lone sycamore' on the southern boundary. The 'lone sycamore' appears to have been left out of the actual footprint shown in the Block Plan.

Was this to facilitate a positive Biodiversity Net Gain?

Simply drawing red lines around inconveniently valuable ecological assets to achieve a positive Net Gain in Biodiversity really calls into question the value of any such calculations.

Altering the site footprint due to inconsistencies in the drafting of plans, or to later include or exclude habitats for economic reasons, is unacceptable.

The Barbastelle bat was recorded by the Ecology Co-op at the edge of the high priority woodland habitat to the southwest of the site. The proposed development site is one of the bat's habitats.

The priority woodland habitat does **not** appear to be listed as part of the Ecology Co-op's Biodiversity Net Gain calculation.

The blackthorn scrub appears to be on-site in the Ecological Impact Assessment and off-site in the Biodiversity Impact Calculation.

Riparian Zone / Lowland Fen:

The Ecology Co-op describes the area immediately north of the site as modified grassland. This area, I believe, has not been modified. This area is influenced by the underlying chalk geology and could be classified as lowland fen, an irreplaceable habitat. It is certainly part of the invaluable riparian zone. This is at high risk of contamination, as is the priority habitat coastal floodplain grazing marsh within metres of the site. However, this area has not been grazed for many years and has sedges and reeds present. Again, it is possible this is actually the irreplaceable habitat of lowland fen.

Ecological Assets - Not Included:

There are also what I believe to be hawthorn and blackthorn trees on-site which don't appear to have been included in the BNG calculation. They can be seen in the photos. You can see them from the gate and the path to the north of the site.

Priority Habitat - Contamination:

The high priority protected reed beds are to the north of the site. There is a high risk of contamination to this habitat. Surface runoff from the site is proposed to be channelled directly into this habitat. I have recorded reed warblers here for many years. Cuckoos (red listed) can also be heard in the surrounding area every year.

Reptile Survey - Inaccurate:

Ecology Co-op Ecological Impact Assessment 2025 - Reptile Survey

The Ecology Co-op state:

"There will be a permanent loss of scrub habitat suitable for reptiles, and this cannot be avoided. This will impact upon 'low' breeding populations of grass snake and slow worm."

Here the Ecology Co-op draws attention to the "permanent loss" of "scrub habitat suitable for reptiles". They highlight that this "cannot be avoided".

They conclude that this "will impact upon 'low' breeding populations of grass snake and slow worm."

There is no mention here by the Ecology Co-op of the effect site clearance and habitat degradation would have had on survey results. The "low" population assessment cannot be seen as accurate. It would appear that the Ecology Co-op has omitted this vital parameter in their calculation of reptile population size.

Ecology Co-op - Reptile Survey 2025:

Table 6 Results of 2025 reptile survey undertaken at Church Farm (cc = cloud cover, BF= Beaufort scale, JSW = juvenile slow work, AFSW= adult female slow worm, JGS = juvenile grass snake).

Date	Survey start time	Temp. degrees centigrade, weather conditions throughout survey	Surveyor	Results		
				Refugia number	Species	Count
24/09/2025	09:28	Air temp: 13°C. 50% cc, breezy (BF3), dry.	Andy Fry	2	JSW	1
30/09/2025	12:37	Air temp: 17°C. 15% cc, still (BF0) dry.	Lara Hulbert	4	AFSW	1
				6	AFSW	1
02/10/2025	15:06	Air temp: 15°C. 100% cc, breezy (BF3) dry.	Meerabai Kings	5	AFSW	1
				6	AFSW	1
					JGS	1
				15	AFSW	1
07/10/2025	09:25	Air temp: 15.9°C. 100% cc, calm (BF1) dry.	Meerabai Kings		JSW	1
				19	AFSW	1
					JSW	1
10/10/2025	09:40	Air temp: 14°C. 100% cc, still (BF1) dry.	Lara Hulbert	5	AFSW	1
				9	AFSW	1
				18	JGS	1
				21	JGS	1
10/10/2025	09:40	Air temp: 14°C. 100% cc, still (BF1) dry.	Lara Hulbert	4	AFSW	1
				20	AFSW	1
14/10/2025	09:00	Air temp: 14°C. 100% cc, slight breeze (BF2), dry.	Andy Fry	4	AFSW	1
				21	JSW	1
17/10/2025	09:48	Air temp: 13°C. 80% cc, breezy (BF3) dry.	Lara Hulbert	4	AFSW	1
				17	JGS	1
				21	JGS	1

Why did the Ecology Co-op begin their reptile survey at the end of September?

Their 'ecological', 'walk-over' survey was conducted on 11 August 2025.

Could it be that they were waiting for at least some vegetation to appear in the flailed field?

The field was flailed to ground level and crushed under tractor tyres on 4th August 2025.

Reptiles will not enter a site with vegetation below 15cm.

This is a technique used by developers to exclude reptiles from a site prior to building works.

The Ecology Co-op laid their refugia for the reptile survey I believe on Thursday 11 September 2025.

If refugia had been laid in mid August, the first reptile survey could have been conducted at the beginning of September, the optimum month for reptile surveys. However, less than one month after the field was flailed, vegetation height at the beginning of September was almost zero.

It is concerning that the Ecology Co-op does not draw attention to these material facts in their report.

The Ecology Co-op conducted their first reptile survey on 24th September 2025.

The second reptile survey was conducted on 30th September 2025.

The remaining five reptile surveys were conducted in October with the final survey on 17th October 2025.

It should be noted that the Ecology Co-op draws attention to the fact that **October is not a good month for reptile surveys** as reptiles are beginning brumation (hibernation). 'Reptile activity is limited'. This can be viewed on their website in their survey calendar. Again this would have had a significant effect on survey results.

Ecology Co-op - Survey Calendar:

<https://static1.squarespace.com/static/64ee0f01178bb2783d0fc672/t/6571efd9573827182bdefd6c/1701965786106/Protected-Species-Survey-Calendar.pdf>

Protected Species Survey Calendar

Many of our ecological surveys are seasonally constrained. Our calendar illustrates the optimum time in the year to survey a particular species.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
 Badgers	Bait marking and sett surveys				Limited bait marking and Sett surveys				Sett surveys				
 Bats - Scoping surveys	Surveys can be undertaken at any time of the year												
 Bats - Emergence and Activity Surveys	Bats in hibernation		Some activity surveys possible		Emergence and activity surveys can be conducted				Activity surveys and limited emergence surveys		Bats in hibernation		
 Bats - Hibernation Surveys	Hibernation roost surveys		Bats emerging		Bats using summer roosts						Hibernation roost surveys		
 Reptiles	Habitat suitability assessments		Limited activity		Peak reptile survey and translocation period			Reduced detection success in hot weather		Peak survey period	Limited activity	Habitat suitability assessments	
 Great Crested Newts	Hibernation period		Limited activity		Presence/absence surveys and e-DNA assessments			Terrestrial and pond larvae surveys possible				Hibernation period	
 Dormice	Hazelnut and nest searches				Nest tube and box surveys, habitat assessments and nut searches (from September)							Nut & nest searches	
 Otters	Surveys possible throughout the year												
 Water Voles	Very limited activity		Habitat Surveys		Habitat field signs and activity surveys						Habitat Surveys		Very limited activity
 Birds	Wintering bird surveys		Some breeding and migrant bird surveys			Breeding bird surveys		Some Breeding and migrant bird surveys			Wintering bird surveys		
 White-clawed Crayfish	Limited activity		Surveys begin		Torch surveys			Torch, hand and trapping surveys				Limited activity	
 Phase 1 and NVC Assessments	Sub-optimal due to plant dormancy				Preferred habitat survey period (spring only for woodland flora)					Sub-optimal due to plant dormancy			
	Optimal Time				 Sub-Optimal Time								

 Optimal Time

 Sub-Optimal Time

The site was cleared using a tractor pulled flailing mower on 04th August 2025. The habitat prior to the flailing is the habitat the Ecology Co-op say they are attempting to survey for its value to reptiles. As that habitat no longer existed, how was that possible?

It is concerning that the Ecology Co-op considers a reptile survey on a site whose habitat had been destroyed fifty one days earlier a meaningful measure of the pre-degraded habitat's reptile population.

Spatial distribution analysis of the data from the Ecology Co-op 2025 Reptile Survey shows that almost all recordings of grass snakes and slow worms were in the southern half of the site. They were also almost entirely distributed around the site's perimeter. What this tells us is that the higher ground of the southern portion of the site is highly favourable for reptiles. It also tells us that the centre of the site is being avoided by grass snakes and slow worms. This, it would appear, is almost certainly a response by these species to avoid predation with such low vegetation levels.

Field Clearance Annually?:

The Ecology Co-op says the field is cleared annually. This is a similarly concerning statement. The cut vegetation was not consistent with one year's growth. This was evident to the lay person and should have been noted and included in the report of the trained ecologist.

Google Maps:

As a reference point, it is useful to observe the site from the gate on google maps. This image was captured in 2011 by google. It clearly shows that the field has been left to naturalise for many years. The diversity of plant life in the field is also evident. It is really tragic looking at that image to consider how it was destroyed so brutally in 2021, and again in 2025.

Habitat Pre-2021:

The field was cleared in 2021 after perhaps fifteen years as scrub. The field was used to keep a horse in at one point. But this was probably more than fifteen years ago now. It wasn't until 2021 that the field was cleared by a tractor and flailing machine in one operation. This occurred in early October 2021; the Ecology Co-op conducted their 2021 survey on 12th October 2021.

Clearance/Survey - Pattern:

Site clearances and habitat destruction preceded ecological surveys by days in both 2021 and 2025.

Again it is extremely concerning that the Ecology Co-op does not consider this inappropriate. It is certainly not consistent with sound scientific practice.

The ecologist for HDC, assigned to the 2022 planning application, Genevieve Broad, states in correspondence with Horsham's planning officer:

“We note that the site has been cleared of bramble scrub prior to the ecology survey.”

There seem to be no consequences to this practice.

Perhaps that is why it has occurred again in 2025.

Not Sharing Data. Loss of Records:

No reptile or bat survey data from 2022 was shared with Horsham's ecologist at the time. As far as we are aware none of this vital data was shared with scientific recording agencies such as the Sussex Biodiversity Record Centre. Otherwise clearly these records would have appeared in the Ecology Co-op's 2025 search for records from the Sussex Biodiversity Record Centre.

The Ecology Co-op admits that much of their bat survey records for 2022, including invaluable static detector data, has been lost in the three years between 2022 and 2025. They attribute this to changes in staffing. This points to a concerning lack of care in the storage and maintenance of scientific records.

Annex II Species:

They also say that including the 2022 survey records was merely to provide context for the site. However, it is understood that surveying over many years gives insight into population changes. In this case the Barbastelle bat, one of the rarest animals in the UK, was recorded on the site in both 2022 and 2025. The significance of this cannot be overstated. This is one of the rarest animals in the UK, an Annex II species, protected at the highest level being recorded at exactly the same site three years apart during two brief surveys. Was the Barbastelle recorded by the static detector in 2022 as it was in 2025? The importance of these records to science and the protection of endangered species, in this case the Barbastelle, is immense. It is extraordinary that the Ecology Co-op appears to consider this so casually.

The Barbastelle is listed on the Ecology Co-op's report as vulnerable. There is no information on the report about its Annex II status and extreme level of protection needed.

The Ecology Co-op's automated static bat detecting data for 2025 shows that the Barbastelle was recorded at the woodland edge to the west of the site an average of 8 times per night. The survey lasted 6 nights. This means that the Barbastelle was recorded approximately 48 times during the survey.

If the Barbastelle was recorded on average 8 times during the night and the Ecology Co-op say that it was likely to be 'commuting', where was this bat or bats commuting to and from, to pass exactly the same spot an average of 8 times a night every night for 6 days?

Barbastelle bats are known to perform patterns in their feeding behaviour where they will forage beside trees and then fly to wetland areas foraging as they go and then returning to the trees to complete the circuit. Is it possible that that is what is being recorded here?

Barbastelles are known to roost in trees. They are also known to hibernate in ancient buildings. The Church of St Peter's perhaps?

Clearly this site is of immense scientific interest and should be protected for that purpose. It really is extremely fascinating to consider the behaviours of these creatures in their habitat.

Any changes to the site could prove catastrophic for all 12 species of bat found here. The Barbastelle cannot be allowed to be disturbed. It is a privilege to know that this species, the very rarest of creatures, is flying through the field a few metres away from the gate. I will certainly think of it in the summer during the evenings when the moths, the Barbastelles preferred prey, are on the wing.

Barbastelles are highly sensitive to light pollution. The dark-sky purity of the site must be protected as a matter of scientific importance to prevent any damage to the Barbastelle's behaviours. Also they are particularly sensitive to noise pollution as their prey are tympanate moths.

Illuminating the area would repel the Barbastelle and create a vacuum effect on the moths depriving the Barbastelle of its food source.

The scrub was identified by the Ecology Co-op as a valuable source of moths for foraging bats. This cannot be compromised by its loss.

Environment Act 2021 - Schedule 14:

The Ecology Co-op makes no mention in their report that site clearance and habitat degradation immediately prior to an ecology survey is referenced within Schedule 14 of the Environment Act 2021 and also the Levelling Up and Regeneration Act 2023. Also under the Precautionary Principle:

"The degradation of habitats refers to activities carried out that **lower the biodiversity value of habitats before a planning application is made** on a site that includes those degraded habitats. The LPA will want to establish the biodiversity value of habitats on any given site **before the degradation** (the pre-development biodiversity value) - so that the **correct biodiversity baseline** can be established, and the **correct biodiversity gain** is secured once the planning application has been approved."

"To address concerns over the potential for the wilful degradation of habitats (e.g. to reduce the baseline biodiversity value of a development site and reduce the cost of achieving a 10% BNG), the **Environment Act 2021** stated that if unauthorised activity (i.e. not in accordance with a planning permission) that degraded habitats that has taken place on or after 30 Jan 2020, then the **pre-development biodiversity value of that onsite habitat is taken to be the biodiversity value of the habitats immediately before the carrying on of the activities that lowered the biodiversity value.**"

Levelling Up and Regeneration Act 2023 (LURA):

"In 2023, the **Levelling Up and Regeneration Act 2023** (LURA) introduced additional wording to further tighten the law regarding degradation by extending the circumstances in which degradation can be addressed. This wording stated that any authorised activity (i.e. in accordance with a planning permission) that is carried out on onsite habitats, or any unauthorised activity (i.e. not in accordance with a planning permission) that is carried out on offsite habitats on or after the 25th August 2023, that cause the biodiversity value of the habitat to be lower than it would otherwise have been on the relevant date (usually the date that a planning application is made), then the pre-development biodiversity value of that habitat is taken to be its biodiversity value immediately before the carrying on of the activities that degraded/lowered the habitat's biodiversity value."

Precautionary Principle:

"Under the 'precautionary principle', where habitat has been cleared the net gain assessment will be required to assume that the value of those habitats were of the

highest possible value, in addition to making assumptions about what species this habitat may have supported.”

Is the Ecology Co-op applying these regulations to the site at Church Farm?

In the Ecology Co-op's Biodiversity Impact Calculation page 6 it states:

"Applying the precautionary principle, a presumption for the higher condition was used where there was any uncertainty in the condition of existing habitats."

Can the Ecology Co-op give clarity on the value it has assigned to the condition of the on-site and off-site bramble scrub? It has called the condition of these habitats N/A?

Can the Ecology Co-op confirm that there was uncertainty in the condition of existing habitats pre clearance?

Or is the Ecology Co-op suggesting that there is no uncertainty as the condition value has been assessed post clearance and the precautionary principle is not being applied.

Site Habitats:

The habitat of the field was a complex mix of plant species including bramble.

I believe hart's tongue fern could be seen from the gate in the field, an ancient woodland indicator species consistent with the chalk geology and ecological continuity. Also I believe tall herbaceous plants were present at the gate such as rosebay willowherb. Did the ecologists from the Ecology Co-op take samples of the cut vegetation to identify species and diversity?

Here the Ecology Co-op describes the site's habitats.

"3.2 Habitats

The site is comprised of cleared bramble scrub, a small stand of blackthorn scrub in the northeastern corner and one individual sycamore *Acer pseudoplatanus* tree in the south of the site (Figure 6)."

The trees immediately to the west of the site are priority woodland. This woodland is not listed as on site despite its proximity. It will certainly be affected by the development of the site as highlighted by the Ecology Co-op, particularly in regard to the bat species. Light spill is a highly significant factor.

Tawny Owls:

These trees have been used by Tawny Owls for at least two decades as we have heard and observed them here over the years we have lived here. I have also

recorded them in the tree or the trees next to the tree that the Ecology Co-op describes as 'one individual'.

Pairs of Tawny Owls are observed here throughout the year and these trees represent a vital part of their habitat and breeding territory. We have recorded this throughout the autumn of 2025 and also through the winter and into 2026 using Merlin Bird ID. Tawny owls are highly territorial and these trees are a part of that carefully guarded territory. They must be protected and the area around them preserved as a wild habitat to support these birds with amber listed conservation status.

Swifts:

I have video footage of swifts swarming around these trees and across the field as far as the eastern boundary and also to the north, feeding on insects arising from the vegetation.

Degradation:

It would appear that the ecologists who conducted the survey on the 11th August 2025 made their entire site assessment in one brief visit. Considering that the field was cleared to ground level and the habitat destroyed on 04 August 2025 seven days prior to surveying perhaps this is an indication of the ecologist's inability to assess the site in any meaningful way.

It is interesting to note that in their 2022 report the Ecology Co-op included documentation of the habitat prior to clearance.

Sharing Data:

If the vital bat record data from the Ecology Co-op's 2022 survey and the reptile survey data from 2022 had been shared with the Sussex Biodiversity Record Centre as it should have been, agencies, including Horsham District Council, would have had access to biological records that would have contributed to a greater understanding of the site four years ago. Purely from an interest and concern for the welfare of wildlife, it would appear that it is an ecologist's duty to share vital data such as this.

The surveys were requested by HDC's ecologist in 2022. Why were these 2022 surveys kept from HDC's ecologist and not shared with the LERC?

If the bat survey data had been shared in 2022 with the LERC as it should have been, the Ecology Co-op would not be in a position in 2026 where half of their 2022 bat survey records for Church Farm are lost.

This all adds to a lack of confidence that care has been taken where such serious consequences as habitat loss and species loss are at risk.

Breeding Birds:

In the Ecology Co-op's 2022 report, the ecologist draws attention to the importance of the site to breeding and nesting birds. Why was this highly important information not included in the 2025 report?

"4.2 Habitats

Clearance of the dense bramble habitat has resulted in a loss of approximately 0.4ha of this habitat, an important habitat for nesting birds and a variety of invertebrates... The loss of the dense bramble habitat to the footprint of the development would result in a permanent negative impact that is significant at a local level.

3.5 Breeding Birds

The dense bramble scrub on site would have provided high value habitat for breeding birds, and a blue tit *Cyanistes caeruleus* fledgling was seen within the bramble in June 2021. The remaining blackthorn, bramble and trees at the site, and the bordering trees, all provide breeding bird habitat. An old nest was recorded within the blackthorn in October 2021.

The SxBRC records search indicates the presence of 213 bird species within 2km of the site.

4.5 Breeding Birds

The bramble clearance will have resulted in the loss of high value nesting bird habitat that will have resulted in a temporary negative impact that is likely significant at a local level, whilst the development proposal would lead to a permanent negative impact."

Ecology Co-op 2022 report - warning against vegetation removal prior to the 31st August:

"If there is to be any further vegetation removal, this must take place outside of the nesting bird season (avoiding 1st March to 31st August), unless the absence of nests is confirmed by an ecologist prior to commencement of works."

As the field was flailed to ground level on 4th August 2025, this would seem to be against their own ecologist's advice that no vegetation should be removed before 31st August. It was made clear in their 2022 report that the bramble scrub had high value to nesting birds.

Hedgehogs:

Here in their 2022 report the Ecology Co-op describes how they found evidence of the presence of hedgehogs on the site.

"4.8 Other Notable Species

Clearance of the site will have resulted in the loss of valuable habitat for hedgehogs.

3.11 Other Notable Species

The bramble scrub would have provided high value habitat for hedgehogs in the form of both shelter and foraging habitat. A dead hedgehog was found during the October 2021 site visit, potentially a result of clearance work. The dense bramble habitat would also have supported numerous invertebrate species, though invertebrates associated with this habitat are typically common and widespread. SxBRC provided 71 records for hedgehogs within the search area."

It is partly because of the rich invertebrate population that hedgehogs are present in the scrub. I have observed hedgehogs at the gate to the field during the summer of 2025.

Ecology Co-op 2022 Report - Not Included:

Why was the Ecology Co-op's 2022 report not resubmitted as a part of this planning application?

It is vital that all relevant information is easily available for scrutiny and understanding.

In the Ecology Co-op's Preliminary Ecological Appraisal 2025 it states:

"As detailed within the 2022 report, vegetation clearance should only take place outside of the bird nesting season (March–August). All other recommendations contained within the 2022 report remain relevant and should be followed.

Yours faithfully,



CEnv"

In their 2022 report the Ecology Co-op issue the following warning:

"It is important that no habitat clearance or other site preparation work should be undertaken until planning permission has been granted and all relevant protections for habitats of importance and protected species have been detailed and implemented. Please be advised that any work to remove or modify habitats outside of typical management may undermine a future planning application."

Is flailing a field on 4th August seven days prior to an ecological survey typical management?

Protection:

For all of the above I urge you to reject the application to build on the land at Church Farm, Upper Beeding and designate it a Special Area of Conservation to provide security for the Barbastelle bat and all the other species that exist there.