



SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

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4 October 2025

By e-mail only to
planning@horsham.gov.uk

Dear Sir or Madam,

Re: DC/25/1312 – Homes England Planning Application for land west of Ifield

I am writing on behalf of the Sussex Ornithological Society (SOS) to **object** to the above planning application.

The SOS is the county bird society, and our aims are to record and study wild birds in the county, to assist in the conservation of birds and to engage, inspire and educate people to enjoy, appreciate and understand birds and their habitats. We have a large database of bird records, which are shared with the Sussex Biodiversity Record Centre (SxBRC) and with other interested bodies. Our membership is approximately 2,000.

We write to strongly endorse the points made by the Sussex Wildlife Trust (SWT) in their detailed submission dated 1st October 2025.

The land which it is proposed to use for this development is of considerable value in terms of bird numbers and diversity of species, with 81 species recorded in the three 1km squares containing the site⁽¹⁾ in the past 10 years (2015-2024). Of these, 15 species are red listed on the Birds of Conservation Concern (BOCC) ⁽²⁾list and 22 are amber listed. In addition, 12 species covered under Section 41 of the Natural Environment & Rural Communities (NERC) Act ⁽³⁾ were found.

As highlighted in detail by the letter from SWT, the planned developments would directly affect several Local Wildlife Sites (LWS), particularly Ifield Brooks Meadows and Hyde Hill, both of which adjoin the site, together with Ifield Mill Pond nearby. We submit that the Biodiversity Net Gain (BNG) and other mitigations put forward in the documents prepared by the developer are wholly inadequate to offset the loss of, and damage to, these valuable bird habitats.

We also share the concerns raised by SWT that the plans put forward for complying with the water neutrality requirements laid down to protect the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site may not be robust enough to ensure that the very large development proposed could meet these requirements as predicted climate change occurs.

For these reasons, we submit that the application should be refused.

We do hope that these comments will receive the Council's due consideration in reaching their decision regarding this very significant proposal.

Yours sincerely

[REDACTED]
On behalf of the Conservation Team
Sussex Ornithological Society

⁽¹⁾ TQ2236 (Hyde Hill), 2337 (Bonwycks) and 2487 (Isfield Brooks)

⁽²⁾ The BOCC list is compiled by a coalition of the UK's leading bird conservation and monitoring organisations and reviews the status of all regularly occurring birds in the UK. The red list contains those species about which there is serious concern because of declining numbers caused by loss of habitat or by climate change, while the amber listed species are of lesser concern, but which are still at risk of major decline. Declining numbers of bird species are a major driver in biodiversity loss.

⁽³⁾ Section 41 of the NERC act refers to a published list of habitats and species which are of principal importance for the conservation of biodiversity in England.