



SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

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3rd September 2025

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

Dear Sir or Madam,

Re: DC/25/1155 - Erection of 59 dwellings with associated open space, landscaping, parking, access, and drainage infrastructure. Land East of Tilletts Lane, Warnham

I am writing on behalf of the Sussex Ornithological Society (SOS) to make a representation in regard of 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.

The area surrounding the land in Warnham which it is now proposed to develop is of considerable value in terms of bird numbers and diversity of species, with 70 species recorded in the 1km square containing the site in the past 10 years (2015-2024). Of these 13 are red listed on the Birds of Conservation Concern (BOCC) ⁽¹⁾ list and 19 are amber listed. In addition, 13 species covered under Section 41 of the Natural Environment & Rural Communities (NERC) Act ⁽²⁾ were found.

While we recognise that this land has been designated for housing in the Warnham Neighbourhood Plan, it would be appropriate in view of the above considerations for a full winter and breeding season bird survey to be performed so as to ensure that the best possible mitigations are put in place. Although this is a Government and Natural England requirement ⁽³⁾ it does not appear from the applicant's Ecological Appraisal that any such survey has been carried out.

We would like to submit that no determination of this application can be made until a bird survey has been undertaken and findings carried through into the Landscape and Ecology Management Plan.

We have concerns regarding the latter document as it stands in that it appears to be incomplete, with large sections apparently pasted from a similar document regarding another site. In view of the demonstrated ecological value of the area, we hope that a revised document will be made available before a decision is made regarding this application. It is important that the aspirations detailed in this document, together with the Biodiversity Net Gain identified in other papers submitted, are realised on-site. We feel that the proposed arrangements whereby the local residents take over the ongoing management of the landscape elements after a 12 month period following completion may be over-optimistic and that more definite commitments regarding these important matters may be required.

We trust that these comments will receive your due consideration.

Yours sincerely



On behalf of the Conservation Team
Sussex Ornithological Society

⁽¹⁾ 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.

⁽²⁾ 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.

⁽³⁾ see <https://www.gov.uk/guidance/wild-birds-advice-for-making-planning-decisions>