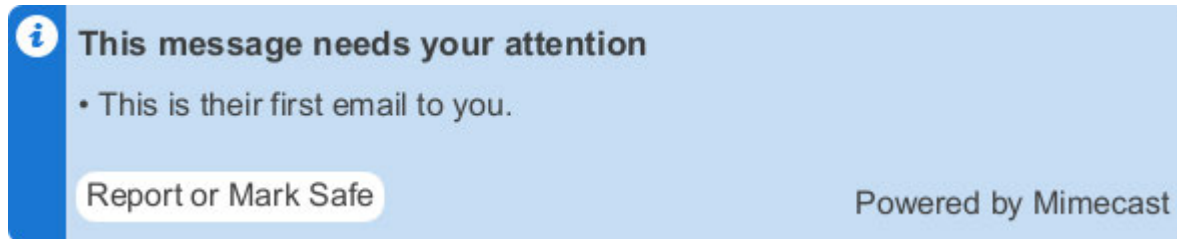


From: [REDACTED]
Sent: 01 August 2026 12:38
To: Daniel.Holmes
Subject: DC/25/2114

Follow Up Flag: Follow up
Flag Status: Flagged



Dear Daniel,

Re planning application DC/25/2114

The developer draws on the concept of the “tilted balance” as laid out in the NPPF to support their application. However, the tilted balance requires refusal where adverse impacts significantly and demonstrably outweigh the benefits, and where policies protecting areas of particular importance provide a clear reason for refusing.

I would argue that for this particular site, this is the case.

On June 24th 2026, West Sussex published their Local Nature Recovery Strategy (LNRS) in line with the Environment Act 2021. The aim of the strategy, as defined on its homepage, “**is to identify the important places for nature that are left, and encourage and target opportunities to restore or create it, where this can have the most benefit for wildlife and people**”.

The strategy’s Local Habitat Map identifies Areas of Particular Importance for Biodiversity (APIB) such as existing Sites of Special Scientific Interest and Local Wildlife Sites, as well as Areas that Could become of Importance for Biodiversity (ACIB). As the proposed site lies within the Adur Water Meadows and Wyckham Wood Local Wildlife Site, the area has been designated as an APIB.

“Statutory guidance strictly defines what should be included in the APIB as the following: • All national conservation sites; • All local nature reserves; • All existing local wildlife sites and areas of irreplaceable habitat.”

On page 68, Part 1 of the LNRS, the following is stated:

“LWS contain features of substantive wildlife value, and are meant to provide more comprehensive coverage of important areas for wildlife than SSSIs.”

This is significant as the LNRS reflects statutory guidance dictating ALL LOCAL WILDLIFE SITES (and therefore the land at Church Farm as it lies within a LWS) be deemed as APIBs, sites where West Sussex County Council’s aim is “to ensure that our first port of call is to look after what we have and to make it better.” This is as it should be and is to be commended.

When viewed on the interactive Local Habitat Map, the true significance of the Adur Water Meadows and Wyckham Woods LWS as a recognised APIB becomes apparent, appearing as it does as a large expanse of shaded pink surrounded by unshaded land. Click to see ACIBs and areas shaded beige appear, identifying surrounding land where the opportunity to restore nature can have the most benefit for wildlife and people. The point being the land shaded pink already has Particular Importance for Biodiversity.

As Rebecca Fry points out in the Strategic Planning Response, the LWS “is a large site. It was first confirmed in 1992 and subject to a resurvey in 2020 which helps to ensure the site boundary and its designation remains justified.” Again, this is significant as it shows that as recently as 2020, the land at Church Farm was deemed to be a justifiable part of the LWS, and therefore of significant existing ecological value, enough value for it now to be rightfully included as an Area of Particular Importance for Biodiversity.

The entire perimeter of the Adur Water Meadows and Wyckham Wood LWS has been shaded beige. The intention is clear. The land surrounding the LWS has been deemed as land where the opportunity to restore nature can have the most benefit for wildlife and people. Initiatives such as the Weald to Waves project and the Adur River Recovery project are doing just that; both aim to restore nature, improve the quality of the River Adur and create wildlife corridors from the High Weald to the sea.

If the entire surrounding perimeter has been identified as an Area that Could Become of Importance for Biodiversity, and the land within the perimeter (the LWS itself) identified as an Area of PARTICULAR IMPORTANCE FOR BIODIVERSITY, how could it make any sense to cut away part of the LWS by building on it? Horsham District Council would be going against the clearly stated aims of West Sussex’s LNRS by decreasing an Area recognised as of Particular Importance for Biodiversity.

Crucially, the land within the LWS, and therefore the land at Church Farm, has already been recognised as land of Particular Importance for Biodiversity, and therefore land which should be preserved for nature, not encroached upon or indeed, destroyed.

It would therefore make no sense for HDC to approve the proposed application, thereby allowing building on greenbelt land within a LWS, outside of the built up boundary, lying as it does within the Weald to Waves Corridor, and which has so recently been recognised as an Area of Particular Importance for Biodiversity.

The UK is one of the most nature-depleted countries in the world. As it says in the LNRS, we have lost nearly half of our wildlife since the 1970s. Protected species including barn owls, bats, badgers, hedgehogs, grass snakes, rare moths and butterflies as well as an extraordinary range of birds have all been recorded living in the site. (Please refer to the records for this area on iRecord.) As Rebecca Fry highlights in the Strategic Planning Response, “the first principle of the West Sussex LNRS is “In our core areas for nature, hold on to what we have and make it better.” Core Areas are those mapped as “areas of

particular importance for Biodiversity” (APIB) which, as detailed earlier, includes Local Wildlife Sites. This principle highlights the need to conserve these existing areas of important habitat, prevent further loss or degradation and improve ecological condition”.

The sheer volume of objections to this planning application bear witness to the value local people give to their Local Wildlife Site. I do not believe there has been a single comment written from a member of the public in support of this application.

Presumably in an attempt to diminish the ecological value of the proposed site within the wider LWS, the Ecology Co-op claims that the site does not include habitats quoted in the citation for the LWS. This is misleading. If the criteria in DEFRA’s citation is used, scrub habitat is listed. Scrub habitat occurs on-site at Church Farm.

Again, as Rebecca Fry points out in the Strategic Planning Response, “part of the importance of the site is its large diversity of habitats ... The diversity in habitats supports a diversity of floral and faunal species. Its particular importance includes birds.”

In conclusion, I urge the Council to act in accordance with the aims of the LNRS for West Sussex by refusing this application.

Kind regards,



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