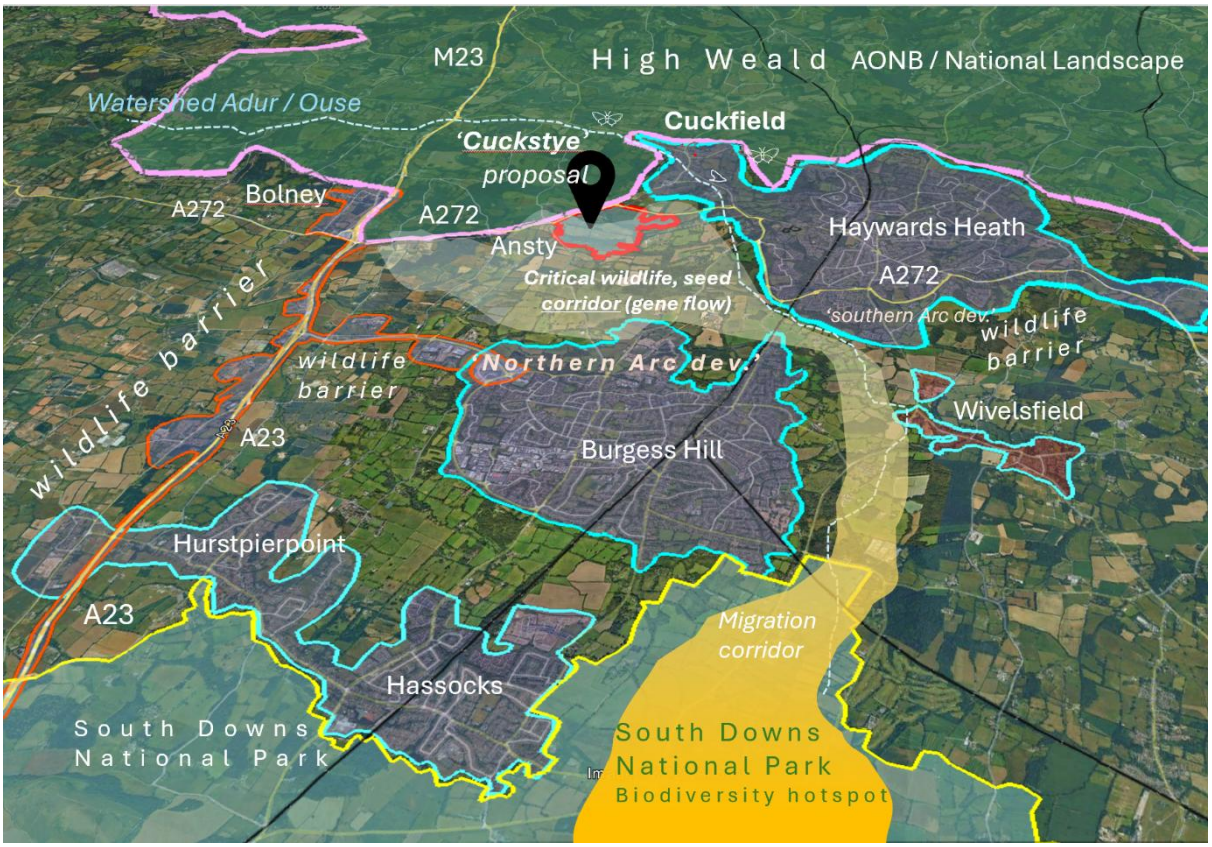
Expert Witness Statement OW – Biodiversity and ecological importance of the Copyhold river, habitats and agricultural land (9th June 2026) - Land between Haywards Heath, Cuckfield, and Ansty (objecting to 'Cuckstye' development)



I do not intend to discuss roads, transport, or other planning matters. **I am here to speak on behalf of the natural environment and to address the suitability of this location for development.**

Based on extensive ecological evidence, including species records collected over many years, I and colleagues understand this proposal would result in the permanent loss and fragmentation of one of the most important biodiversity landscapes in the region. The consequences would not only affect wildlife but also the ecological services upon which local communities depend, including water regulation, pollination, carbon storage, and landscape resilience.

This is not in any way a degraded or previously developed site. **It is an exceptional living landscape that supports thousands of recorded species** (GBIF had 52,592 species records with 2 mile radius) and forms part of a wider ecological network linking the High Weald and the South Downs. Within this Sussex biodiversity hotspot, habitats

function together as an interconnected ecosystem, allowing species to move seasonally, breed, forage and adapt to environmental change.

The destruction and fragmentation of such a landscape would create lasting ecological damage that cannot be recreated. **Future generations may reasonably ask why a site of such ecological importance, was selected for large-scale development when opportunities exist on grey-site land nearby.**

At a time when national policy emphasises (and ratifies into international law) nature recovery, habitat connectivity, sustainable development, and the protection of irreplaceable natural assets, this proposal flies in the opposite direction. The question is not whether this landscape has value, the evidence clearly demonstrates that it does. The question is whether we are prepared to lose it permanently.

[**However, If I am to try to give biodiversity a voice**, I must mention the roads. This development would turn what is already a hand saw into a giant chainsaw, creating a far greater barrier to wildlife movement across the landscape. Those of us who regularly use the area's exceptional public footpaths already know how difficult and dangerous it can be to cross the surrounding A272. On its long straight sections, the road is often treated like a racetrack. Increasing traffic associated with this development would only further fragment habitats and making movement for both wildlife and people even more challenging]

The location and scale of the proposed Cuckstye development appears ignore the permanent loss of invaluable agricultural soils and natural hydrological functions. These are not simply fields awaiting development, they form part of a living watershed that provides food-producing capacity, water storage, flood attenuation, biodiversity, and ecological connectivity on a regional scale (see map)

This site occupies an exceptionally sensitive position on the upper watersheds of both the River Adur and River Ouse. It also sits on what is arguably the most important remaining ecological connections between the High Weald National Landscape and the South Downs National Park. **To the west, ecological connectivity is already severely blocked and constrained by the M23 corridor**. To the east, extensive urban development on the southern slopes around Haywards Heath create a further barrier to wildlife movement. Here, on the free and unblocked cusp of the Weald, one of the last remaining landscape-scale connections still survives.

The importance of this upper catchment location extends far beyond its boundaries. Around 550,000 people live within the River Adur catchment and **depend upon its river network for water management, flood resilience, environmental quality, and**

recreation. And climate change projections indicate increasing flood risk across the catchment, making the protection of upper watershed landscapes more important, not less.

Hydrological science demonstrates that healthy upper catchments are amongst the most valuable parts of a river system. Landscapes rich in vegetation, biodiversity, and functioning soils slow the movement of water, improve water quality, reduce flood peaks, recharge groundwater, and provide drought resilience. **Urbanisation at the headwaters has the opposite effect**; with ecological processes lost, the consequences are carried downstream for generations, creating long-term environmental and financial costs.

During my work documenting Sussex ghyll woodlands, I have spent years studying and filming the Copyhold Stream and its tributaries. I have filmed brown trout (and even sea trout in the Ouse below Cuckfield during covid) in these waters, among the highest reaches of the Adur catchment where they are known to occur along with bullhead, damselflies, and many other invertebrate species that depend on clean, functioning stream systems.

Although the Environment Agency currently classifies parts of the Copyhold Stream water body as being in poor ecological condition, (due to pollution pressures associated the Cuckfield sewage discharge), however the other range of ecological indicators, makes sections of this stream amongst the healthiest remaining Adur headwaters. LINK

The Copyhold Stream is, in my experience, has some of the **finest surviving examples of a Sussex ghyll woodland stream. Its value lies not merely in the species it supports, but in the integrity of the entire ecosystem, the microclimate (supporting species present further west), ancient bluebell woodland with alder lined liverwort and fern-rich banks contributing to a complex ecological state developed over millennia.**

These qualities cannot be recreated through mitigation or landscaping, they are irreplaceable. Development on the scale proposed, would fundamentally alter the stream's character and ecological functioning, resulting in the loss of one of the region's most distinctive natural assets.

The significance of this corridor is not only ecological but historical. Archaeological discoveries, including Mesolithic artefacts recovered from the valley (see image of hand axe), indicate that these stream systems have served as natural routes through the landscape since prehistory, connecting the South Downs and the Weald for thousands of years. Today they perform the same function for wildlife, providing vital movement

corridors that allow species to disperse, pollinate, feed, breed, and adapt to environmental change.

The biodiversity associated with this watershed is remarkable. Within and around the site I and others have recorded (logged on iRecords etc) species including Yellowhammer, Nightingale, Tawny Owl and Barn Owl, together with notable butterflies such as new colony of Wall Brown, White-letter hairstreak, Brown hairstreak, Purple hairstreak, Silver-washed fritillary, Giant stream lacewing, and the exceptionally rare in Sussex, Sword-grass moth (*Xylena exsoleta*) with most recently a new colony of iridescent green Forester (*Adscita statices*) day flying moths discovered. The watershed area (within 3 miles of Cuckstye (0.7 (PTES), 1.2, 2.8 (PTES[1]), 2.84(),) supports at 4 monitored populations of Hazel Dormice (*Muscardinus avellanarius*), one of Britain's most threatened highly protected mammals. Nationally, dormice have disappeared from roughly two-thirds of their former sites in little more than two decades and are now extinct in many counties. These records are from my personal experience – GBIF (https://www.gbif.org/) (Global Biodiversity information) has 7,200 species records (with coordinates) within around 1 mile radius of Ansty, 52,592 species records around 2 mile and 82,671 results 3 mile radius. The immediate area is exceptionally rich in fungi (over 142 species in local woodland) and new populations of RSPB red conservation status Lesser Spotted woodpecker (*Dendrocopos minor*) (only 1000 -2000 pairs in the UK LINK)

Taken together, the evidence demonstrates that this is far more than a development site. It is a functioning watershed, a biodiversity corridor, a climate resilience asset, and cultural landscape as one of the last remaining natural connections between two of southern England's most important landscapes. Its loss would not simply be a local change in land use; it would represent the permanent degradation of an ecological system whose value extends far beyond the boundaries of the proposed development.

Finally recent research by Agarwala et al. (2025), involving authors from the Universities of Sussex, Cambridge and Yale, shows how biodiversity loss represents a major and under-recognised financial risk. The study concludes that degradation of natural systems can weaken economic resilience, reduce national creditworthiness and increase government borrowing costs. Simply put, nature loss contributes to weaker economies, higher debt risk and more expensive public borrowing.

This is particularly relevant in relation to pollination and food production and this pollinator-rich site. (Approximately 75% of global crop types depend, in part, on animal

[1] Peoples Trust for Endangered Species https://ptes.org/campaigns/dormice/surveying-and-monitoring-hazel-dormice/national-dormouse-monitoring-programme-ndmp/

pollinators (World Economic Forum, 2019)). Yet insects populations are collapsing; the Buglife survey found that **flying insect abundance in the UK fell by around 60% between 2004 and 2021, a decline widely associated with habitat loss and fragmentation.**

In summary between Cuckfield and Ansty, the mosaic of ancient fields, woodland, hedgerows and the Copyhold Stream Sussex Ghyll system is of exceptional local and regional ecological importance. **It functions as a wildlife corridor, contributes to water regulation within the upper Adur catchment, whilst retaining the invaluable agricultural potential that is set to become increasingly valuable as climate change and energy constraints require local food production.**

As outlined throughout this objection, development of the proposed site would result in wide and long reaching irreversible damage to biodiversity, ecological connectivity and ecosystem services. It would remove productive agricultural land, damage the a mos fragile part of the upper Adur watershed, reduce pollinator habitat, and further fragment wildlife movement corridors at a time when species most require greater mobility to adapt to climate change and huge local development of the North Arc following Haywards heath southern farms removal.

The site lies within a biodiversity-rich landscape on the watershed of two of Mid Sussex's principal river systems. Its location, on the High Weald adjacent to the High Weald AONB and National Landscape and close to the South Downs National Park (3.7 miles), makes the protection of ecological functions particularly important.

P ermitting this scheme in its proposed location would be inconsistent with the UK's stated commitments to halt biodiversity loss, restore nature and enhance ecological resilience, **including commitments made under international agreements such as the UN Convention on Biological Diversity and its ratifications at COP 16[2].** The long-term environmental, economic and social costs of degrading this landscape substantially outweigh any short-term benefits of development.

[2] **UK sets out biodiversity commitments to protect nature** (https://www.gov.uk/government/news/uk-sets-out-biodiversity-commitments-to-protect-nature)