

**Hearing Statement for Spatial Strategy submitted by The Woodland, Flora & Fauna Group re Matter 5c of the MSDC 2026 Examination Updates in relation to sites DPSC3, DPSC4, DPSC5, DPSC6 & DPSC7.**

We have no confidence in the Spatial Strategy process applied to the Local Plan or that informed consideration has been given to the selection of sites for development. It appears that restrictions relating to development in the High Weald and the Southdowns National Park have resulted in a choice of placing the majority into the Low Weald without any consideration of impact or value. Sayers Common appears one of the major casualties of this failure.

The Countryside around Sayers Common is of great value in biodiversity terms. The landscape is of great importance to nature and the population who have settled here.

The new development proposals as presented in the Mid Sussex District Plan 2014-2031 Update are very damaging to the area and severely impact previously introduced measures to improve the natural environment for the benefit of flora & fauna. These measures were commenced in 2004, undertaken by local volunteers, and benefitted landscape, ecology, and resident well-being.

The proposals as described in DPSC3, DPSC4, DPSC5, DPSC6 & DPSC7 conflict drastically with the National Planning Policy Framework which require policies and decisions to 'contribute to and enhance the natural and local environment'.

These fragmented development proposals supposedly linked by walkways and green corridors are of little value in nature terms as a replacement to the current footpaths and valued open landscape areas that currently exist, so will significantly devalue the high natural environmental status of the area.

The semi-natural ancient woodland area to the north of Reeds Lane called Furze field (now threatened by DPSC6 & DPSC7), was first worked on by volunteers for its existing nature value, and now has a large woodland pond as an additional feature as a result of their effort. Wildlife boxes of many types have been mounted in and around the area with supported populations continuously nurtured and monitored. These fragmented development proposals, together with previous permissions, now almost completely surround this valued natural asset which is described on the Local Nature Recovery Strategy map as an area of importance for biodiversity. It is also one where many countryside and wildlife enhancement initiatives have been implemented by The Woodland, Flora & Fauna Group over two decades.

The mitigating circumstances prescribed in the MSDC DPN2 policy document advocating net gain are for green corridors linking the existing landscape assets to create a coherent landscape structure including outside development boundaries that links to existing and proposed landscapes. These proposed corridors which will facilitate public access to such valuable natural assets are from practical experience, catastrophic to their survival. They introduce dog walking, child play, and recreation activities, which damage ponds, trees, secluded natural habitats, and forge human access pathways throughout, progressively driving the wildlife away and destroying the habitat and abundance of valuable flora contained therein.

Every time such countryside development incursion occurs, the accompanying word assurances always given are that the areas will be the beneficiaries of 'appropriate arrangements and funding for future long-term management, maintenance and stewardship', but reality based on years of experience, has confirmed that these assurances are baseless and meaningless rhetoric designed to overcome the local population's environmental concerns. The undertakings quickly evaporate

as time progresses. It therefore invalidates the regularly provided reassurance of future monitoring to safeguard an environmental asset into the future, to ensure a development proceeds.

Our group has recently been asked by the local parish council to restore and maintain a village pond in Sayers Common Village which was the supposed responsibility of MSDC to ensure was preserved and maintained in a similar way. Due to the years of neglect, since the development was completed, and an outcry from local residents at the increasingly delapidated state of the area, we agreed to try to restore it to the nature feature it once was. Mid Sussex District Council, although still the nominated 'wardens' of the area, acknowledged that they could not meet their obligations and gave way to parish council pressure for a solution to be found elsewhere. It should not be the responsibility of volunteers giving up their valuable time, to extricate the District Council from their committed obligations and previous promises of stewardship.

It is with the experience of this and many other similar examples of failed promises of this continuing stewardship, that we speak with certainty about the inevitable demise of existing environmental assets when development approaches.

The area absorbed by the outlined planning proposals threatened by DPSC3, DPSC4 & DPSC5, also rob the natural environment of distinctive countryside landscape which is required by our local nature conservation group to maintain the successful barn owl conservation area it has created. Since its creation in 2006 to support this then endangered species, it has built on its success and expanded to cover a large area of Mid Sussex. It has been created with the utilisation of the most appropriate areas of distinctive District landscape providing the terrain required to support them. All these proposed DPSC development areas not only remove huge proportions of such terrain in the Sayers Common/Albourne countryside, it also impacts heavily on the surrounding areas where carefully chosen sites of nesting and roosting boxes reside in close proximity to the proposed areas of development.

Originally chosen to assist owls found in Sayers Common and Albourne countryside, we now have an expanding population reliant on this conservation area to provide support to established breeding pairs. Barn owls mate for life, and inhabit favoured boxes in countryside that supports their requirements. There are many of these that will be affected detrimentally by these proposals, which destroy a large section of this conservation area and the two decades of volunteer effort required for its creation.

With countryside areas now so limited and us having previously responded to appeals from MSDC Officers in 2004 to study, protect and enhance our local countryside, these proposals are either borne out of ignorance of the ongoing initiative, or are in complete disregard of the natural environmental consequences and the two decades of volunteer effort that has been expended to achieve them.

Our dismay upon seeing the proposals urged us to invite representatives of MSDC to see some of the examples of our huge effort themselves, and realise the detrimental impact they would have. They confessed that they had no knowledge of our work when given a tour of these sites by us. To persist with the development proposals despite a lack of consultation with local groups such as ourselves, (we were invited in recent years to be members of a Homes England committee to safeguard natural environmental features in the Burgess Hill Northern Arc development and were LNRS invited respondents) indicates that the spatial strategy in this Plan for sites DPSC3, DPSC4, DPSC5, DPSC6 & DPSC7 has not taken an appropriate approach at the strategic level towards countryside protection by focussing all these development proposals in areas of valuable natural landscape.

The NPPF states that 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating to an alternative site with less harmful impacts) adequately mitigated for, or as a last resort compensated for, then planning permission should be refused.'

In the Mid Sussex MS08 Development Management Policies-Proposed Modifications Response to IDJB-02 January 2026, it states that 'the implementation of any biodiversity net gain should align with local objectives and priorities for biodiversity improvements and nature recovery'. This area of local countryside is already subjected to biodiversity improvements and nature recovery by ongoing work undertaken over many years by The Woodland, Flora & Fauna Group. The proposals severely damage these achievements, and no amount of net gain measures applied to compensate for these development proposals could restore the disastrous outcome they would inflict in landscape and biodiversity terms. This is landscape that is now highly valued and in short supply in the Low Wealden area of Mid Sussex, and should have its biodiversity assets nurtured and protected.

These development proposals fail these criteria. We therefore urge that the Plan is failed on these points so that they can be reconsidered and the damaging consequences avoided.

Michael Nailard.

On behalf of **The Woodland, Flora & Fauna Group**.



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