HAMSEY PARISH

COUNCIL LDC LOCAL PLAN REGULATION 18 (2026) RESPONSE

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Planning for Good

1. Introduction

1.1 This representation is submitted by Hamsey Parish Council in response to the Lewes District Council (LDC) Local Plan Regulation 18 consultation (2026).

1.2 Hamsey Parish Council is not opposed to new housing in principle. However, we support only those developments that demonstrate a comprehensive, joined-up approach to the needs arising from the scale of housing proposed. We believe in building for a sustainable, thriving and economically viable community that will support our people and environment. We would be delighted to actively support the planning discussion to allow this to happen, noting other more holistically suitable sites from the LAA. A sustainable and holistically feasible site must include, as a minimum, clear and deliverable provision for supporting infrastructure, impacts on the local highway network and road safety, education capacity, biodiversity and ecological mitigation, waste and servicing, noise and wider amenity, surface water drainage and river runoff, and the effects on landscape character and views across the South Downs National Park. It should promote public health and connect people to the resources they need as well as supporting, not demolishing, our agricultural land and species that live within.

Applications should clearly evidence how these matters have been assessed and how the necessary measures will be secured and delivered alongside the proposed development. Overall, very little has changed in the proposed scheme, the layout, the vehicle and parking impacts and the major loss of environment and landscape, what drawn changes have been made are less than meaningful and make no effort to address the overwhelming objection to this scheme. Some plot number changes, minor linework tweaks and a simple swapping of building types adjacent to the existing village make for essentially the same scheme.

1.3 It has been prepared on behalf of the Parish Council by Leah Coney MA (Oxon) MRTPI and Richard Lewis MRTPI MCIHT MTPS with additional information provided by Parish Councillors and members of the local community.

1.4 This response focuses on the overall LDC spatial strategy and then considers the two proposed allocations at Cooksbridge, identified as CB1- Land north of Hamsey Lane and CB2- Land to the East of Cooksbridge.

1.5 This response also reviews the supporting evidence base to ensure it is robust so the LDC Local Plan is considered to be positively prepared, justified, effective and consistent with national policy as it moves to the next stage in preparation.

1.6 Site allocations must be **sound**, sustainably located, environmentally effective and compliant with national policy. As such, this response is also informed by the draft National Planning Policy Framework (NPPF 2025) which is clear that policies which are inconsistent with the National Decision-Making Policies (NDMPs) contained within it will be given very limited weight. Therefore, to ensure the enduring application of the LDC Local Plan, the Council must be mindful of both existing and emerging national policies.

1.7 This response evaluates the spatial strategy and the sites suitability against:

- National policy requirements (NPPF 2024 and draft NPPF 2025)
- National Planning Policy Guidance (NPPG)
- Levelling Up and Regeneration Act 2023
- Hamsey Neighbourhood Plan (2015 – 2030)
- The emerging Local Plan policies (SDS1, SDS2, SDS3, CB1, CB2)
- Settlement Hierarchy Review – Phase 2 (2025)
- Settlement Hierarchy Review (July 2023)
- Interim Sustainability Appraisal (SA) Report (December 2025)
- Lewes Local Housing Needs Assessment – Update *(2025)*
- Lewes District & South Downs National Park Authority – Landscape Capacity Study *(2012)*
- Lewes Landscape Sensitivity Assessment *(AECOM, December 2025)*
- Lewes Cumulative Landscape Assessment of Potential Allocation Sites *(AECOM, December 2025)*
- Lewes Landscape and Visual Appraisals of Potential Development Sites *(Version 4, September 2025)*
- Cooksbridge – Cumulative Landscape Assessment (Figure 2 Mapping) *(AECOM, 2025)*
- Strategic Flood Risk Assessment (SFRA) – Level 2 *(AECOM, 2025)*
- SFRA Sequential and Exception Tests – Interim Regulation 18 Version *(2025)*
- The Water Cycle Study (2025)
- The Shared Transport Evidence Base (STEB) report (2023)
- Infrastructure Delivery Plan (202)
- East Sussex Local Cycling and Walking Infrastructure Plan (2020)

2. Summary of Objection

2.1 This representation will evidence that the overall spatial strategy is considered to be inappropriate, as expressed through allocating 751 homes at Cooksbridge. It is not adequately evidenced or justified, and the Plan has not demonstrated that this is the most appropriate strategy when reasonable alternatives and constraints are properly applied.

2.2 The spatial strategy is flawed because it prioritises accessibility over overall sustainability with SDS2 providing a policy lever to "enable" strategic scale growth to a Tier 4 settlement with acknowledged environmental, landscaping and service constraints. It thereby contradicts the Plan's other spatial policies that seek to avoid disproportionate growth in less sustainable locations, maintain the existing settlement pattern, and direct development to the most sustainable locations.

2.3 The Parish Council therefore strongly objects to the allocation of CB1 and CB2 for a total of up to 751 homes which together comprise a new settlement. Taken together, the settlement hierarchy, landscape capacity/sensitivity evidence, cumulative SDNP setting impacts and the Interim SA do not support the scale or distribution of growth proposed at Cooksbridge. The Local Plan has therefore not demonstrated that its spatial strategy is justified.

2.4 The combined allocation of CB1 and CB2 proposes strategic-scale growth at a Tier 4 village in a highly sensitive landscape, contrary to the Council's own settlement hierarchy, landscape and sustainability evidence. The Sustainability Appraisal identifies ongoing residual harms, particularly in relation to the setting of the South Downs National Park. When assessed both individually and cumulatively, CB1 and CB2 are not supported by the evidence base and should be removed.

2.5 The summary key grounds for objection are:

a) The spatial strategy is flawed and the site allocations contained with the emerging Local Plan are not supported by the development management policies contained with it nor the supporting evidence bases.
b) The sites are immediately adjacent to the South Downs National Park and form an important part of the setting of this protected landscape, the harm to which cannot be sufficiently mitigated given the proposed scale of development.
c) CB2 is not a genuinely sustainable location for major development due its location in a Tier 4 settlement. The presence of a railway station does not negate the lack of facilities within the existing village.
d) The presence of the railway line passing through Cooksbridge is a constraint on development. The presence of level crossing on the A275 creates congestion, impacts air quality and noise pollution and impacts active travel routes.

e) The cumulative impact of proposed developments has not been adequately assessed.
f) The Plan has not demonstrated that reasonable alternatives have been properly considered.
g) No evidence-based capacity threshold has been established for the village in terms of capacity including education, sewerage capacity and upgrades to rail crossings.
h) The allocation at the current scale proposed is unlikely to be viable given the infrastructure cost of effectively establishing a new settlement and achieving compliance with policy SDS2.
i) Masterplanning across CB1 and CB2, required at this scale of development, is not possible as CB1 is already awaiting determination[1].

2.6 The Introduction of approximately 750 dwellings would represent a large-scale and transformative change. It would urbanise the entirety of the local landscape character and generate a continuous, visually dominant block of built form surrounding the boundary of the SDNP. Such a change would materially alter the settlement morphology and diminish the perceptual separation that currently exists between the small villages within the parish of Hamsey. It would inappropriately add a suburb to the village which would be out of character with the development pattern evident in the older part of the village and significantly compromise the characteristics identified in the sensitivity and capacity assessments, resulting in high adverse landscape effects.

3. Spatial Strategy

3.1 Draft policies SDS1 – SDS3 comprise the overall spatial strategy for the Local Plan. SDS1 places heavy emphasis on accessibility, particularly opportunities for walking, cycling and public transport, in shaping the strategy. While accessibility is an important component of sustainable development, it is not automatically synonymous with sustainability. National policy requires development to be directed to the most sustainable locations, taking full account of environmental capacity, settlement hierarchy, landscape sensitivity, flood risk and access to day-to-day services. Elevating accessibility as a primary determinant risks narrowing the sustainability test and allows development to be justified in locations that remain environmentally constrained and poorly served, notwithstanding the presence of public transport. In this respect, the approach in SDS1 risks being inconsistent with its own objective of directing development to the most sustainable locations.

3.2 It is noted that the Phase 1 Regulation 18 (2024) draft SDS1 stated that the spatial strategy would seek to be:

[1] LW/25/0339 - The provision of 151 residential dwellings (Class C3) including 40% affordable housing and commercial floorspace provision (Class E), with public open space, soft and hard landscaping, play space, community orchard, vehicular access, car and cycle parking provision and associated infrastructure including SUDS provision. Land At Cooksbridge Road Cooksbridge East Sussex

"...locating development at the most accessible and sustainable locations in accordance with the settlement hierarchy.
Overall, the spatial strategy seeks to protect and enhance environmental assets, maintain local distinctiveness, and retain the existing settlement pattern while meeting identified development needs"

3.3 As a result, the word sustainability has been dropped entirely from the proposed policy wording of SDS1 leaning on accessibility to justify the inclusion of a Tier 4 settlement as a significant contributor to overall growth.

3.4 SDS2 does introduce sustainability, rightly concentrating growth in Tier 1 and 2 settlements where sustainable transport options can provide a realistic alternative to the car. It further states that villages will accommodate small-scale development where it reinforces community sustainability. The countryside and rural character will be protected from development that would harm its landscape or ecological value. The policy wording reflects the current and emerging NPPF.

3.5 However site allocation policies CB1 and CB2 are contrary to almost every key criterion in SDS2. Even with the station, it is clear the proposed allocations are not in an accessible location compared with Tier 1 and 2 locations which are obviously appropriate for the reasons stated; the scale of development and its situation adjacent to and within a sensitive landscape is contrary to SDS2's requirement that development should conserve and enhance the countryside, landscapes and nature.

3.6 Proposed Policy SDS3 defines a Tier 4 settlement as:

"Villages that have very few facilities and services and have poor levels of accessibility to higher order settlements. Few, if any, employment opportunities are available.

3.7 Earlier drafts of the emerging Local Plan (2021) tested growth of approximately 1,100 dwellings at Cooksbridge. That option was not carried forward, indicating that the Council accepted that development at that scale would result in unacceptable harm to Cooksbridge as it is in effect subsumed by a new village. However, the evidence base does not identify a clear capacity threshold below which harm would be avoided. The reduction in numbers therefore represents a compromise rather than an evidence-led spatial strategy, and the Plan, nor the Interim Sustainability Appraisal have demonstrated why this scale of growth is appropriate or the most sustainable option.

3.8 As such, this current draft represents a significant evolution in the emerging Plan but lacks a transparent explanation of how and why strategic village growth was introduced between consultations.

4. Sustainability at Cooksbridge

4.1 Sites CB1/CB2 are proposed in a settlement with limited services, no secondary school, almost no primary school capacity, no GP surgery or retail offer, with total reliance on higher-order settlements for most day-to-day needs. While the Plan suggests that the railway station improves sustainability, recent appeal decisions and national policy make clear that proximity to a station does not, in itself, make a location sustainable, particularly where everyday services remain distant and walking routes are poor. The proposed allocations extend development away from the village core, potentially increasing distances to the station, the primary school and existing community facilities (depending on the final layout.) There is no detail added in CB1 and CB2 about how a vision-led approach to transport would be delivered in a masterplan.

4.2 The Settlement Hierarchy Review (2025) retains Cooksbridge as a Tier 4 Local Village, describing such settlements as having limited capacity for growth. However, CB1 pushes the settlement boundary northwards, treats Cooksbridge as capable of absorbing significant expansion, relies on future infrastructure and behaviour change to justify sustainability. This creates a clear hierarchy–allocation mismatch. In comparison to previous settlement hierarchy reviews the current review (2025) now acts as supporting evidence for growth decisions already being proposed, effectively reverse engineered to support the preferred spatial option.

4.3 Although existing Cooksbridge residents' benefits from rail accessibility, sustainable development requires assessment across social, economic and environmental objectives. As a Tier 4 settlement, Cooksbridge has a limited-service base and does not function as a self-contained community, meaning strategic growth would continue to generate substantial outward travel for day-to-day needs. The proposed scale of development relies on future infrastructure provision and is subject to deliverability risks, particularly arising from environmental concerns around flood plain dynamics and climate change risk, landscape capacity and significant effects on the setting of the South Downs National Park and cumulative impacts on settlement pattern and valley openness. (see Section 5) Taken together, these factors indicate that Cooksbridge is not among the most sustainable locations for strategic-scale growth.

4.4 There is a high risk that strategic growth in a Tier 4 village risks creating a new dormitory village unless employment/service growth matches it. Cooksbridge does not currently function as an economic hub and as such it relies on aspirational infrastructure, transport and mitigation measures to become sustainable. The inclusion of CB1/CB2 treats Cooksbridge as a service centre even though it clearly is not.

4.5 The allocation of large-scale strategic growth in Cooksbridge is contrary to SDS2:

“Growth will be concentrated within and adjoining Tier 1 and Tier 2 settlements where public transport and active travel can provide realistic alternatives to the car.”

However, Clause B under Spatial Distribution also says development will be “*prioritised along identified transport corridors”*, has been inappropriately applied to CB1 and CB2 to effectively "enable" the allocations CB1 and CB2 to exist.

4.6 The draft NPPF (2025) does not provide a blanket presumption for development near railway stations and specifically refers to locations “*within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services*” (Policy S8h). Footnote 26 defines such stations as:
“*those in a top 60 Travel to Work Area and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains per hour overall, or two trains per hour in any one direction.”*
Neither Lewes nor Cooksbridge feature in the 230 Travel to Work Areas published by the ONS and there is only one train per hour in any direction.

4.7 Tier 4 settlements, by their nature, offer a limited range of day-to-day services. In the case of CB2, parts of the site lie in excess of 1km from the existing primary school, requiring journeys of over 20 minutes on foot via rural, unlit routes along Hamsey Lane, where there is no footway. Such distances and conditions exceed those generally regarded as attractive or practical for walking by primary-age children and any additional illumination would have significant impact and conflict with the SDNP Dark Skies policy annoy.. The presence of a railway station does not address access to local education or the absence of everyday services, and, in any event, the rural character of roads away from the A275, with limited carriageway width, no continuous pedestrian infrastructure and no pedestrian crossing on the main road, means that moving around the village on foot is inherently constrained.

4.8 Appeal decisions consistently confirm that the presence of a railway station does not, in itself, make a location sustainable for housing development. Proposals in villages such as North Fambridge (APP/X1545/W/25/3370476), and Althorne, (APP/X1545/W/24/3341731), albeit for minor schemes, have been dismissed where, notwithstanding rail access, settlements lacked sufficient services, walking routes were unattractive or unsafe, and proposals conflicted with the spatial strategy. Rail access must be considered in the wider sustainability context These decisions demonstrate that accessibility to rail is only one factor and cannot override limited settlement role, reliance on private car travel for daily needs, or wider policy constraints. If the same reasoning applies to the proposed allocations at CB1 and CB2 in Cooksbridge, then not only are they contrary to the spatial strategy but if they were development proposals, would likely be refused on this basis.

4.9 There is also a clear tension between the draft NPPF direction to make best and most efficient use of land requiring a minimum density of at least 40dph around station developments (draft policy L3(3)), which is highly unlikely to be achieved on a scheme within the setting of a protected landscape which is likely to be low density and in accordance with draft NPPF Policy N4(4) "*should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas*". Small scale development within a tightly defined boundary which fits with the existing scale of development would be far more appropriate, avoiding a generic suburban sprawl from the South Downs National Park that lends nothing to creating a sense of place in its rural context. This however must also be considered in the context of cumulative development further up the A275 and also, more notably, the proposed allowance of 30-40 dwelling for the land opposite beechwood hall within the SDNP local plan.

5. National Park Setting, Landscape Sensitivity & Capacity.

5.1 The Landscape Capacity Study (2012) identified little to no capacity for development east of Cooksbridge (now CB2), explicitly cautioning that development in this location would result in significant adverse landscape effects. The study also did not identify land north of Cooksbridge (now CB1) as suitable for strategic-scale development, indicating that any limited capacity was restricted to minor, carefully designed extensions rather than significant settlement expansion.

5.2 Both proposed sites lie immediately adjacent to the South Downs National Park (SDNP) boundary, which follows the railway corridor. Although located outside the designated boundary, the sites form part of the setting of the National Park, as defined in landscape planning practice, due to their intervisibility, functional relationship and contribution to views and landscape character.

5.3 The baseline landscape is characterised in the Landscape and Visual Impact Assessment (LVIA) as:

- Open Low Weald farmland and the Ouse Valley floodplain; and
- A landscape experienced through long-distance and elevated views from the South Downs scarp, including public rights of way and areas of open access land.

5.4 There is a clear visual and perceptual distinction between the undeveloped valley floor and scarp slopes within the SDNP and the compact built form of Cooksbridge. The openness of the landscape limited existing built form and its role in maintaining separation between the National Park and surrounding settlements result in high susceptibility to change.

5.5 Key visual receptors include:

- Walkers and users of public rights of way on the South Downs scarp;
- Users of open access land within the SDNP; and

- Residents and visitors experiencing elevated panoramic views northwards across the Ouse Valley.

5.6 For these receptors, the perception of openness and rural transition forms an integral part of the valued landscape experience. Given the designated status of the landscape and the nature of the views, these receptors are considered to be of high sensitivity.

CB1 – Land North of Cooksbridge

5.7 The Landscape Sensitivity Assessment identifies land north of Cooksbridge (CB1) as having medium–high to high sensitivity and being poorly contained. The site plays an important role in settlement separation, particularly in relation to Old Cooksbridge, and forms part of the rural transition toward the South Downs.

5.8 The site is identified as contributing to the setting of the South Downs National Park, with clear intervisibility from elevated locations on the scarp.

5.9 Development at CB1 would introduce new residential built form extending the settlement edge northwards into open farmland. This would increase settlement width and massing when viewed from elevated ground and viewpoints within the SDNP, with development clearly perceptible beyond the railway corridor, including the introduction of street lighting, required for active travel routes which would conflict with the SDNP Dark Skies policy in the setting of the Park.

5.10 As a result, the proposal would interrupt the current visual containment of Cooksbridge, resulting in a high degree of landscape and visual change arising from the extension of built form into open countryside and an expanded visual envelope.

5.11 Mitigation through planting or reduced densities would be limited in effectiveness due to elevated viewpoints, long-distance visibility and seasonal leaf loss. As a result, the perceptual change in settlement form could not be fully mitigated.

CB2 – Land East of Cooksbridge (Ouse Valley)

5.12 CB2 would result in large-scale residential development within the open Ouse Valley, introducing built form into a landscape currently characterised by openness and floodplain land uses. This would fundamentally alter the relationship between the valley floor and the South Downs scarp.

5.13 The Lewes Landscape Sensitivity Assessment (Site 19HY – Land North of Cooksbridge) identifies high–medium sensitivity to medium-scale strategic mixed-use development, meaning the site is unlikely to be able to accommodate such development other than in very limited circumstances without significant adverse effects on landscape character and visual amenity.

5.14 From within the SDNP, development at CB2 would be highly visible across the valley floor, where built form would be perceived as encroachment into an open and undeveloped landscape. The sense of openness and the quality of the foreground and middle-distance views would be substantially eroded, resulting in a high magnitude of change.

5.15 Given the flat topography of the valley, the scale of development and its visual relationship with elevated scarp viewpoints, these effects are unlikely to be mitigated to an acceptable level.

Cumulative Effects and National Park Setting

5.16 In combination, CB1 and CB2 would extend Cooksbridge both northwards and eastwards, effectively reshaping the settlement. The cumulative effect would be a substantially increased visual footprint within the Ouse Valley and a reduced effectiveness of the railway corridor as a perceived settlement edge.

5.17 From the South Downs National Park, Cooksbridge would appear larger, more continuous and more urban in character. Visual separation between the National Park and Low Weald settlements would be reduced, and the rural transition and openness of the valley would be significantly diminished.

5.18 The Cumulative Landscape Assessment reinforces these conclusions, identifying very high impacts on settlement pattern, increased visibility from the Downs and a risk of creeping urbanisation at the foot of the scarp. These impacts arise from the scale and location of development and are therefore inherent and not capable of effective mitigation.

5.19 These findings are consistent with the 2023 AECOM Large Sites Assessment, which concluded in respect of Site 11HY/19HY (now CB1/CB2) that it is unlikely to accommodate medium-scale mixed-use development overall, or only in very limited situations, without significant adverse character change or visual impacts, particularly in relation to coalescence with Hamsey and Old Cooksbridge and the existing settlement pattern.

5.20 Notwithstanding these conclusions, the Parish Council's request for the designation of a strategic green gap to prevent coalescence has not been taken forward, removing a key potential mitigation mechanism.

5.21 CB2 gives rise to particularly acute concerns due to its scale and location within the Ouse Valley, which the Landscape Sensitivity Assessment identifies as open, highly visible and sensitive to large-scale development.

5.22 The Interim Sustainability Appraisal does not positively endorse development at CB2 and identifies residual adverse effects under the preferred scenario, including landscape harm, impacts on the setting

of the National Park, and infrastructure and water environment constraints. It explicitly states that the preferred scenario should not be interpreted as the best outcome overall.

5.23 Although both sites lie outside the designated National Park boundary, LVIA principles require consideration of effects on views from the Park and on its perceptual qualities of openness, tranquillity and rural character. The railway line does not function as a visual barrier, and development north of it would remain visible from elevated locations within the Park.

5.24 In LVIA terms, development at CB1 would result in moderate to major adverse, and in the case of CB2 major adverse, visual effects on high-sensitivity receptors within the South Downs National Park. Individually and cumulatively, the proposals would materially alter settlement containment, erode valley openness and harm the visual setting of the National Park. These cumulative effects would be unlikely to be capable of effective mitigation.

5.25 The proposed allocations are therefore unable to be reconciled with the enhanced statutory duty introduced by Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) on plan-making authorities to seek to further the statutory purposes of Protected Landscapes and to give particular weight to the impacts of development on their setting where this affects the appreciation of their special qualities. Where development outside a National Park would materially affect its setting and the appreciation of its special qualities, that duty is fully engaged and must be given substantial weight in plan-making. In this case, there are significant and residual adverse effects on the setting of the South Downs National Park arising from the proposed allocations, yet the emerging Local Plan does not demonstrate how the duty to conserve and enhance the National Park has been met.

5.26 Draft Strategic Policy SDS1 seeks to maintain and enhance the natural environment, including landscapes, and retain the existing settlement pattern; however, the allocation of CB1 and CB2 would result in harm to the setting of the South Downs National Park and a material erosion of landscape character, demonstrating a clear inconsistency between the spatial strategy and both national legislation and the Plan's own policy objectives.

6 Movement and Transport

Achieving Sustainable Development

6.1 Local Plan Policy CB1 and CB2 would introduce 'medium' to 'low' density development in a Tier 4 location with limited services and accessibility, contradicting the proposed strategic polices SDS1 and SDS2 which acknowledge the need to reduce car dependence by providing improved access to a range of extant transport and community services by prioritising development in higher-order settlements.

6.2 With very limited availability of and scope for community infrastructure, the Cooksbridge Tier 4 settlement is very unlikely to provide opportunities for reducing car dependency relative to Tier 1 or Tier 2 locations.

6.3 Even if an advisory target of a 10% mode shift from car use were achieved as suggested in the WSP Interim Infrastructure Delivery Plan 2025 (mode shift option), the overwhelming majority (70%+) of personal trips to and from the development for commuting would still be car-borne. This assumption seems realistic: the Transport Assessment (Highways Technical Note for Cala Homes land North of Cooksbridge, Motion, July 2025) for the current planning application anticipates 80% of peak hour trips would be made by car, and a further 4.6% by passengers in cars. This is, by any measure, a car-dependent pattern of travel, likely reflected in the demographic profile of future occupants, and it clearly does not account for off-peak journeys which would have a lower percentage share carried by rail.

6.4 Furthermore, whilst Cooksbridge has a railway station it also has a level crossing, currently, between 7,500 and 12,000 vehicles pass through the crossing each day. New development on the A275 corridor would add pressure to what is already considered a high-risk location due, in part, to its proximity to the station, with outbound vehicles added southbound during the AM peak by the 751 dwellings. In addition there would be an increase in traffic going to the school, which has the potential to cause queuing over the crossing if it is not adequately managed by the proposed drop-off arrangements proposed to be delivered as part of northern allocation. Network Rail would need to provide an opinion and set out the scope of any safety mitigating measures, likely attracting further enabling contributions from the developer.

6.5 To achieve even a modest shift in travel behaviour towards the target, essential community facilities would need to be secured prior to submission of a detailed application, implemented and opened, and necessary investment to support public transport and active travel within and beyond the site boundaries, connecting with other communities, would need to be delivered prior to first occupation. All of this would be necessary to fulfil the vision-led modal hierarchy-based transport and sustainable development requirement in policy SDS2 in a location with very little existing provision, rather than being delivered where a range of infrastructure and services are already in place within reasonable walking distance.

6.6 Land promoters of a previously proposed allocation of 1,100 homes in the same area suggested a modest (incomplete) range of local services and an active-travel oriented masterplan could be delivered at the level of development. We question whether 751 homes (or potentially 600 on CB2 given the current application on CB1) would be viable given the scale of infrastructure needed to genuinely reduce the need to travel by car and achieve modal shift towards even the modest 10% target suggested in the WSP interim infrastructure development plan (2025).

6.7 Even at this strategic level, we suggest the scope of potential costs to the eventual developer(s) makes delivering SDS2 in Cooksbridge very high risk in respect of the policy's doubtless laudable intentions and it may therefore be materially unsound. Indeed, we believe there is a strong likelihood that only a proportion of the required infrastructure and / or services would be deliverable once the viability of schemes is factored in. Developers may seek to negotiate a reduced or delayed requirement which would undermine the vision-led approach to transport required by SDS2 by reducing the village's potential self-containment and thereby increasing the need to travel (by car).

6.8 The main problem with failing to front load sufficient sustainable social and transport infrastructure prior to first occupation is that undesired travel habits will become established at what is otherwise our best opportunity to inculcate more sustainable travel patterns linked to major changes in people's lives caused by moving house. It will therefore be very difficult to achieve the aims of a sustainable travel plan and avoid car dependence.

6.9 In draft policy SDS2's own terms, notwithstanding the clause "*regardless of location*" promoting development to be "*prioritised along identified transport corridors*" misdirects the Plan to allocate significant development to Cooksbridge, where the A275 and the railway line are identified as those corridors. These physical "corridors" actually hinder connectivity, increase car dependency, increase pressure along the A275, at the level crossing the drove level crossing, increase general pedestrian safety on and around the narrow lanes between Cooksbridge, Hamsey and Barcombe, and at junctions towards Lewes and indeed would add traffic and parking pressure in the closest service centre of Lewes. This second level crossing on the Drove is and has been continuously missed and ignored under this policy plan as has the pedestrian crossing into the back of Malthouse Way. Both would have drastically increased risk profiles as a result of increased development. See point 6.18.

6.10 Draft policy SDS2 is fully supported and would meet the NPPF test of effectiveness but only where it delivers development only to Tier 1 and 2 locations which already provide a choice of modes of transport and community infrastructure. These should then be improved and where is opportunity, to re-use brownfield land, to deliver better urban design outcomes and reduce car dependence.

6.11 Conversely, draft policies CB1 and CB2 make no reference to vision-led transport planning, preferring instead to express more standard car-oriented approaches and a vague approach to providing active travel infrastructure. The policies' supporting text appears divorced from the wording of SDS2 with no explicit cross-referencing or reinforcing of the principles or vision-building set at the strategic level. The policies as drafted miss the opportunity to describe what is meant by vision-led transport principles on the ground; how the development is designed in a way that facilitates and invites active travel rather than driving, and what local services should be provided as a minimum to minimise the need to travel by car.

Level Crossings

6.12 It is notable that Cooksbridge Level Crossings do not feature in the Lewes District Infrastructure Delivery Plan 2020 or in the Shared Transport Evidence Base 2023 (STEB.) However, what is set out in the STEB for an earlier iteration of the draft Local Plan was the assessment that development including Cooksbridge:

"*would add approximately 550 vehicles per hour in the cumulative scenario at the A275 / B2116 junction to the south of Cooksbridge. The majority of growth will be on the north-south movement and would lead to additional delays on the minor B2116 arm...Options to explore additional lane capacity on the minor arm would be restricted by land availability and signalisation, subject to further modelling and feasibility, is potentially the only option to improve capacity*".(Page 90)

6.13 It is noted that 88% of this additional movement would be north/south along the A275. Given its location just over 600m to the south of the Cooksbridge Level Crossing, this is a relevant consideration when considering likely impacts on the level crossing, especially if signalisation is to be introduced on the junction with the B2116. It also has to be borne in mind the level crossing at Cooksbridge already produces queues when the gates are down, these are often up to 0.7km long in each direction and a recently recorded 14 minute downtime. Network Rail statistics sourced by the Parish Council show the crossing is in the top 60 busiest level crossings in the country. Network rail must be consulted on these developments plans.

6.14 Network Rail assesses risk and the amount of protection needed at any given level crossing including:

- Train factors: speed, frequency, stopping distance, line ahead-visibility;
- User / traffic factors: pedestrian traffic volume, road traffic composition and volume including slower agricultural vehicles, and likelihood of misuse (such as drivers, cyclists or pedestrians crossing between lowered half barriers);
- Site location: urban vs rural context, risk of queues backing up onto the crossing, sightline constraints, and history of collisions and near-misses; and
- Operational factors including the type of crossing, eg public road, public right of way, private, or at / near a station.

6.15 The A275 is a full-barrier crossing with CCTV / MCB-CCTV-type operation (i.e., signaller-monitored with road lights and full barriers) It is established that the A275 already carries between c.7,500 and 12,000[2] vehicles each day. The A275 barrier has been risk assessed as having a current cumulative risk of 4 (High). Network Rail would need to be contacted to understand the level of contributions or

[2] Sources https://roadtraffic.dft.gov.uk/count-points/6852 (south of Cooksbridge A275) + https://www.railwaydata.co.uk/levelcrossings (date 2020) 10,503

remedial measures required to make the level crossing safer, such as the removal of parallel parking, installation of additional keep clear markings and management of regular incidents that may cause traffic to back up (such as school drop off). These would likely be an added cost for any developer. The level crossing also prevents the introduction of a simple pedestrian crossing over the A275 to access the station due to the risk of vehicles backing up across the rail tracks, unless a costly, fully integrated system is introduced.

Year	Count method	All motor vehicles	Cars & taxis	LGVs	HGVs	Pedal cycles	Motorcycles	Buses & coaches
2024	Estimated using AADF from previous year on this link	11,835	9,250	2,032	227	117	225	102
2023	Estimated using AADF from previous year on this link	11,692	9,140	1,996	227	122	227	102

Figure 1 Traffic data, A275 South of Cooksbridge. Source Dept. for Transport.

Year	Count method	All motor vehicles	Cars & taxis	LGVs	HGVs	Pedal cycles	Motorcycles	Buses & coaches
2024	Manual count	7,334	5,854	1,148	181	23	80	70
2023	Estimated using AADF from previous year on this link	7,348	5,603	1,450	191	9	71	34

Figure 2 Traffic data A275 – (Resting Oak Hill) north of Cooksbridge. Source Dept. for Transport.

6.16 A full technical transport assessment would therefore be required as evidence in support of the Regulation 19 Local Plan including the overall queue lengths arising from increased vehicle movements arising from the Local Plan including the proposed allocations at Cooksbridge and the resulting likelihood of higher safety risks, or mitigations of existing risks at the level crossing site.

6.17 Local residents have been out monitoring the current queue lengths at peak times and have provided photographic evidence to demonstrate that congestion is already a significant issue, prior to any additional development generating further vehicle movements.

6.18 There is a second level crossing in Hamsey at The Drove. This is an automatic half barrier crossing with two half-barriers (AHBC) that only close the entrance lanes to the crossing, with standard crossing road-lights and audible alarms. Such crossings were originally designed for use on roads with infrequent traffic and not suitable for roads with regular traffic. There is considerable local concern that with an additional 751 homes, located in and around Hamsey Lane, which leads to the Drove, this may become a rat run for people looking to avoid the A275 level crossing.

6.19 The scale of development proposed at Cooksbridge would materially change traffic and user patterns at this location, triggering the need for reassessment under Network Rail and ORR guidance. In these circumstances, retention of an AHBC without upgrade or closure would be unlikely to be acceptable given the rural location of the crossing, the types of vehicles including farm traffic using it, as well as cyclists and walkers and the width of the road either side of the crossing is likely to be considered an increased risk.

6.20 Finally, there is a public right of way (HAM/8/2) which runs to the southwestern corner of proposed site CB2 and provides the most direct pedestrian route to the station. This is an open level crossing with no barriers or signals, which relies on the user's judgment as to train speed and distance and whether it is safe to cross. This proposal would likely elevate this footpath from an historic low use rural footpath to an active travel route, significantly increasing usage and safety concerns. Open level crossings are recognised as inherently hazardous, particularly for children, disabled users and cyclists. This crossing would require a significant upgrade to be considered an appropriate option for station accessibility.

Figure 2. Public Footpath across proposed site CB2 with open access crossing over the railway line.

Accessibility & Connectivity.

6.21 We confirm the village's poor connectivity in the 2025 NPPF-endorsed Department for Transport's Connectivity Tool which gives a score of 39/100 around Cooksbridge Station, reflecting the presence of limited (rural) public transport (the figure is nearer 30 near the proposed allocation sites.) Compared with Lewes, which has relatively good score (the central area exceeding 79/100) and even Ringmer – another focus area for development under the accessibility-first approach, the village is very much at the lower end of accessibility.

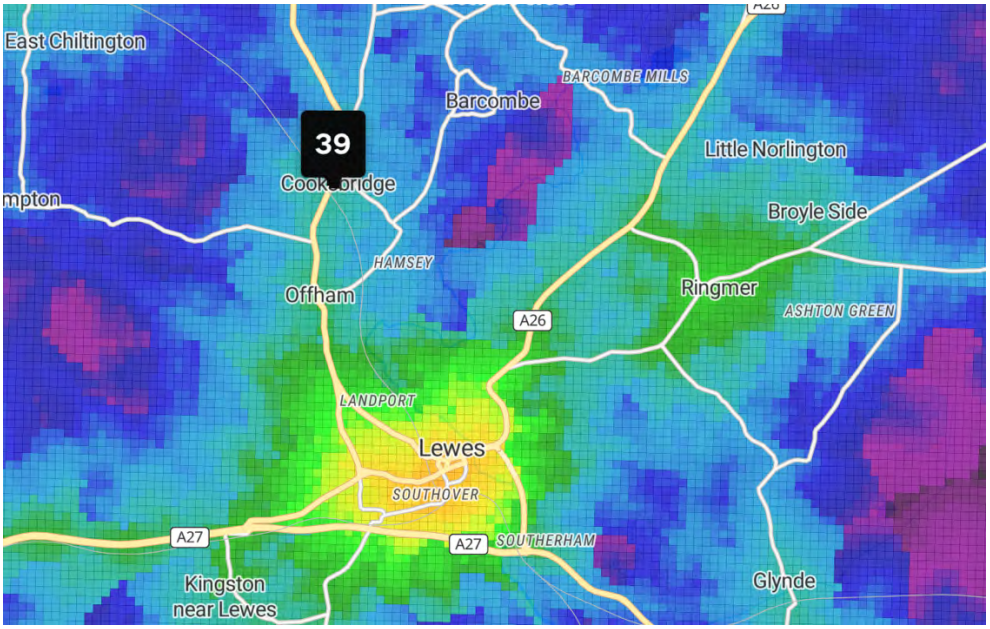


Figure 3 Cooksbridge (DoT Connectivity Tool)

6.22 Cooksbridge Station has one train each way, each hour, serving Victoria and Lewes. It therefore does not meet the definition of a "well-connected "rail station as set out in the draft 2025 NPPF. Three local bus services operate on the A275, the 121 operates hourly from 7am – 7pm; weekdays (more limited at weekends), the 122, an infrequent service from Barcombe Mills to Lewes via Cooksbridge Station, and a third service the 167 twice a week. There are no local services or significant employment opportunities.

6.23 Currently there are no signed cycle routes; however, the East Sussex LCWIP identifies a cycling route connecting Lewes with Cooksbridge via Hamsey Lane, with onward connections going northwest into the South Downs National Park. A walking route from Lewes town centre is identified which extends as far north as Hamsey Lane (approximately a 1-hour walk) but this crosses private land and has accessibility issues.

6.24 The village has no commercial community infrastructure services save for a farm shop and a petrol filling station on the A275 between the village and Offham, and public houses at Offham and Old Cooksbridge. None of these services are within reasonable walking distance of the proposed development allocations and, although there is a narrow footway alongside the A275, the walk, and certainly the cycle is unlikely to be pleasant or feel safe.

6.25 To enable and encourage widespread use of sustainable modes by new residents in accordance with draft policy SDS2, we anticipate a reasonable range of incentivising interventions would be required in a Tier 4 location such as Cooksbridge to make up a recognised shortfall, together with an urban design approach that visually prioritises sustainable travel. It is reasonable to suggest that these 'incentivising options' would need to be demonstrably good enough to make sustainable travel a convenient and appealing option if they are to stand a chance of success. Such measures inevitably

require a minimum range of potentially costly buildings, service enhancements and infrastructure to support the requirement expressed in draft policy SDS2, that sites should be accessible by a choice of modes (including improvements), including from neighbouring built areas.

6.26 We could reasonably apply a distance and / or time criterion for walked and cycled access to local shops, schools and workplaces. Generally (drawing on what has become a generally established 15 or 20 minute town principle) it is recognised that people need access to a range of social infrastructure within 15-20 minutes' walk of where they live for local-order facilities such as pharmacies, community centres, primary schools and small-scale employment opportunities, or 15-20 minutes' cycle or easy public transport access for higher order activities such as secondary schools or large medical centres usually found in higher tier settlements. We reasonably suggest that, with limited exceptions, this should be the total time travelled including walked connections to public transport stops, if alternatives to driving are to compete effectively. Such a situation is most likely to be achievable in Tier 1 or 2 locations.

6.27 To enable and naturally encourage walking, wheeling, cycling and access to public transport, the following interventions may be considered or required to meet the policy as set out in SCS2:

- A network of LTN1/20 consistent walking and cycling routes built into the masterplanned site, with good onward access to the railway station and connecting with Lewes via the strategic alignment identified in the LCWIP. Design effort will be required to ensure the segregated cycle and pedestrian routes are as level and accessible as possible given the terrain, with good natural surveillance and low motor traffic speeds where cycles share the carriageway.
- Infrastructure and other measures to support walking and cycling in the existing village, in part to mitigate the traffic impacts of the development, delivered through s.106 or s.278. Once again this would need to meet LTN1/20 to avoid objections from Active Travel England. Existing footways are narrow and typical for rural areas and, considering best practice advice in the DfT's Inclusive Mobility publication, sub-standard for accessibility. They feature no measures to support cycling.
- Additional bus stops and shelters, and a shelter and improvements for accessibility at the existing bus stop. The local authority's Equality Duty and Inclusive Mobility would demand an accessible bus stop meaning a wheelchair user could enter the bus using the bus stop boarder; the shelter would include a perch seat and accessible information panel; and an extended traffic regulation order would be needed to cover a bus stop cage designed to allow the bus to draw right up to the kerb.
- An additional bus stop pair and accessible boarders to serve the proposed development, together with any frequency enhancements and evening services to be funded for an agreed period until they are viable.

- A contribution (with other developments) towards upgrading the level crossing, which is likely to be required by Network Rail for the scale of development proposed given its classification as a “high risk crossing near a station”.
- A new controlled zebra or signalised crossing, noting predicted increased motor traffic through the village resulting from additional development along the A275 corridor (not mentioned in the STEB report or the interim Infrastructure Development Plan). This would have to be integrated with the level crossing to prevent queuing vehicles blocking the barriers or being stranded across the tracks which is already an issue. See appendix photos.
- To further enable and encourage active travel, community infrastructure would be required, including a village store, a pharmacy, additional school places, a doctors surgery, land dedicated for employment uses and, potentially, upgrades to local bus and rail stopping patterns to raise frequencies towards a turn-up-and-go level of service.
- To achieve the low densities envisaged, and depending on the masterplan’s design, each house may be accompanied by a larger amount of built highway land and service runs than would be the case at a higher density.

6.28 Without the degree of certainty brought about by the existence of local services in higher-tier settlements and robust planning conditions and agreements agreed prior to submission of a detailed application, there is no guarantee whatsoever that promised community infrastructure will be delivered at all, let alone in early phases of development. This situation risks increasing car dependence, a primary reason for refusal of any future planning application relating to the site.

6.29 Based on similar development allocations proposed in the Mid-Sussex Local Plan (R19, 2024), we suggest future occupants would appear likely to be from SOC classes 1-3, a high car-ownership demographic, adding to what SCS2 would clearly view as a car dependent location leading to a refusal of planning permission.

7 Wastewater Capacity

7.1 The Water Cycle Study (2025), explicitly identifies Cooksbridge Wastewater Treatment Works (WwTW) as one of three locations in the district where existing treatment capacity is insufficient to accommodate the level of growth proposed in the Local Plan.

“The headroom assessment completed for this WCS indicates the Cooksbridge WwTW is currently operating close to capacity and the planned growth would significantly exceed the permitted capacity”.

7.2 While the Water Cycle Study suggests that on-site wastewater treatment may be technically possible, this introduces cost, viability and deliverability risks, particularly when combined with other infrastructure requirements such as school expansion and transport and connectivity improvements. It should be strongly noted that Cooksbridge residents in Chandlers Mead have been experiencing prolonged sewage discharge into their houses and gardens as LDC are fully aware of, with circa 79 hours of sewage spillage into the gullies and ultimately the `north End Stream in January 2026 alone.

7.3 This should not be ignored; Cooksbridge is specifically named as a constrained location where connection to the existing network cannot be assumed. As such, it provides further evidence of an unsustainable location for all but modest future growth as the infrastructure cost is too high to make any development of the proposed scale viable. Even of the required work were to be funded, as the SA notes, upgrades to strategic infrastructure are dependent on external providers (water company, EA) and multiple landowners which increases the risk of delayed delivery.

7.4 In this context, directing strategic-scale development to a Tier 4 settlement with known wastewater constraints is neither justified nor effective, and leads to the conclusion that reasonable alternatives involving a significantly reduced scale of growth at Cooksbridge would be more proportionate and perform more sustainably.

8 Sustainability Appraisal and Reasonable Alternatives.

8.1 The Interim Sustainability Appraisal (SA) identifies two reasonable alternative growth scenarios to the emerging preferred strategy (Scenario 1) These alternatives demonstrate that the allocation of up to 751 dwellings at Cooksbridge is not the only means of addressing housing need, and that alternative distributions of growth would be more appropriate and sustainable given Cooksbridge's role as a Tier 4 settlement.

8.2 While the SA notes that Scenario 1 performs well against certain sustainability topics, it is explicit that the preferred scenario should not be interpreted as the best overall option. Importantly, the SA identifies residual adverse effects for Cooksbridge under the preferred strategy, particularly in relation to accessibility, transport and water infrastructure. The SA also identifies concerns under the preferred scenario (Scenario 1) in relation to landscape and the setting of the South Downs National Park.

8.3 By contrast, the reasonable alternatives (scenarios 2 and 3), substantially reduce growth at Cooksbridge to 95 dwellings. Whilst this still represents a 60% increase in the growth of the parish, which could still be argued to be excessive, this demonstrates a clearer alignment with the settlement hierarchy. It would reduce environmental and infrastructure-related harms as well as materially lessening the scale and visual extent of development within the Ouse Valley and impacts on views from the National Park. Reducing growth at Cooksbridge would limit outward travel to higher-order

settlements and enable development to respond more positively to the village extension's location on the edge of the visually sensitive South Downs and more generally its rural context.

8.4 These alternatives therefore represent more appropriate and sustainable options for Cooksbridge and should be given significant weight in the assessment of whether the Local Plan's current spatial strategy is justified.

8.5 The Interim SA treats Cooksbridge as an *exception* (railway station/cycle potential) but still records residual concerns over impact on the setting of the National Park, under the preferred scenario (Scenario 1). It is explicit that the preferred option should not be read as "best overall" and that decisions are made "on balance," not because impacts are resolved. It is not a robust justification for transformational growth at a Tier 4 location.

9 Ecology

9.1 Evidence submitted separately by the Wild Trout Trust (See Appendix) following a request by the local Environment Agency Fisheries Technical Specialist, highlights the exceptional ecological importance of the North End Stream and its tributaries, which support a locally distinct and nationally rare population of migratory Sea Trout (the 'Sussex Tiger') (See Appendix). These watercourses provide critical spawning and juvenile habitat and are already subject to water quality pressures, including sewage overspills and low-flow events. The proximity, scale and extent of development proposed at CB1 and CB2, particularly where parts of the sites directly adjoin the stream corridor, would materially increase risks arising from pollution, surface water run-off, disturbance and long-term pressure on water infrastructure.

9.2 The Parish Council would like to commend the evidence report submitted, noting that given the recognised sensitivity of these habitats, the uncertainty surrounding effective mitigation over the lifetime of the development, and the statutory requirement to avoid harm to irreplaceable and vulnerable ecological assets, the proposed allocations cannot be regarded as environmentally sustainable or consistent with national policy on biodiversity and the water environment and would fail the soundness test.

10 Conclusion

10.1 The allocation of sites CB1 and CB2 at Cooksbridge for up to 751 dwellings is not supported by the Local Plan's own evidence base and represents a fundamental misalignment with the settlement hierarchy, sustainability objectives, landscape capacity assessments and national policy requirements. Taken together, the evidence demonstrates that Cooksbridge, as a Tier 4 settlement with limited services and significant environmental and infrastructure constraints, is not a suitable or sustainable location for strategic-scale growth.

10.2 The proposed spatial strategy prioritises accessibility over genuine sustainability, resulting in disproportionate development in a highly sensitive landscape that forms part of the setting of the South Downs National Park. The scale of growth proposed would fundamentally alter settlement character, erode landscape openness, increase car dependency, and place undue pressure on transport, wastewater and community infrastructure, with no clear or deliverable mitigation strategy.

10.3 The Interim Sustainability Appraisal confirms that reasonable and more sustainable alternatives exist which significantly reduce growth at Cooksbridge and better align development with higher-order settlements. In the absence of a transparent, evidence-led justification for the proposed scale of development, the allocations cannot be considered justified, effective, or consistent with national policy.

10.4 Hamsey Parish Council therefore maintains its strong objection and concludes that allocations CB1 and CB2 should be removed to ensure the Local Plan is sound and capable of adoption.

10.5 Hamsey Parish council also fully support whilst not wanting to repeat, the responses by following organisations

- Don't Urbanise Hamsey Campaign Group
- Ouse & Adur Rivers Trust Consultation Response
- LDC and our own commitment to the River Ouse Charter
- Northend Stream Advisory Report (See appendix)
- Saving the Sussex Tiger Report (See Appendix)

Appendix

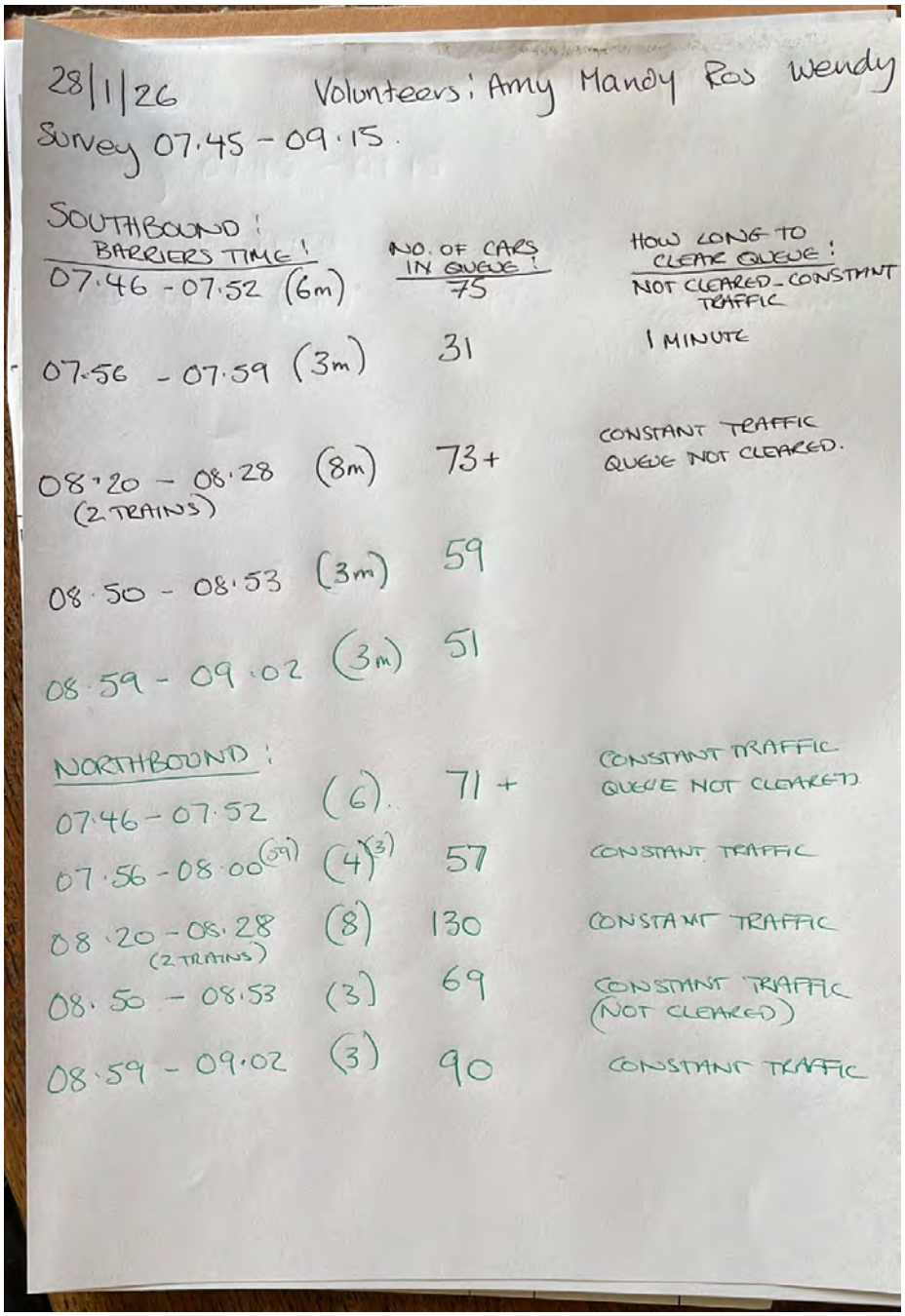
Cooksbridge Level Crossing Traffic Data

Photo looking North from Hamsey Lane/A275. Thursday 12th February, 2026. 08:30AM

Photo looking North from Hamsey Lane/A275. Thursday 6th February 2026. 08:27

Photo looking South towards Level Crossing above East Field CB1. Thursday 12th February 2026. 08:25

Photo showing vehicle stopping across yellow tracks due to congestion with Hamsey lane, apx 20 seconds. 28.01.26



28/1/26 Volunteers: Amy Mandy Ros Wendy

Survey 07.45 – 09.15.

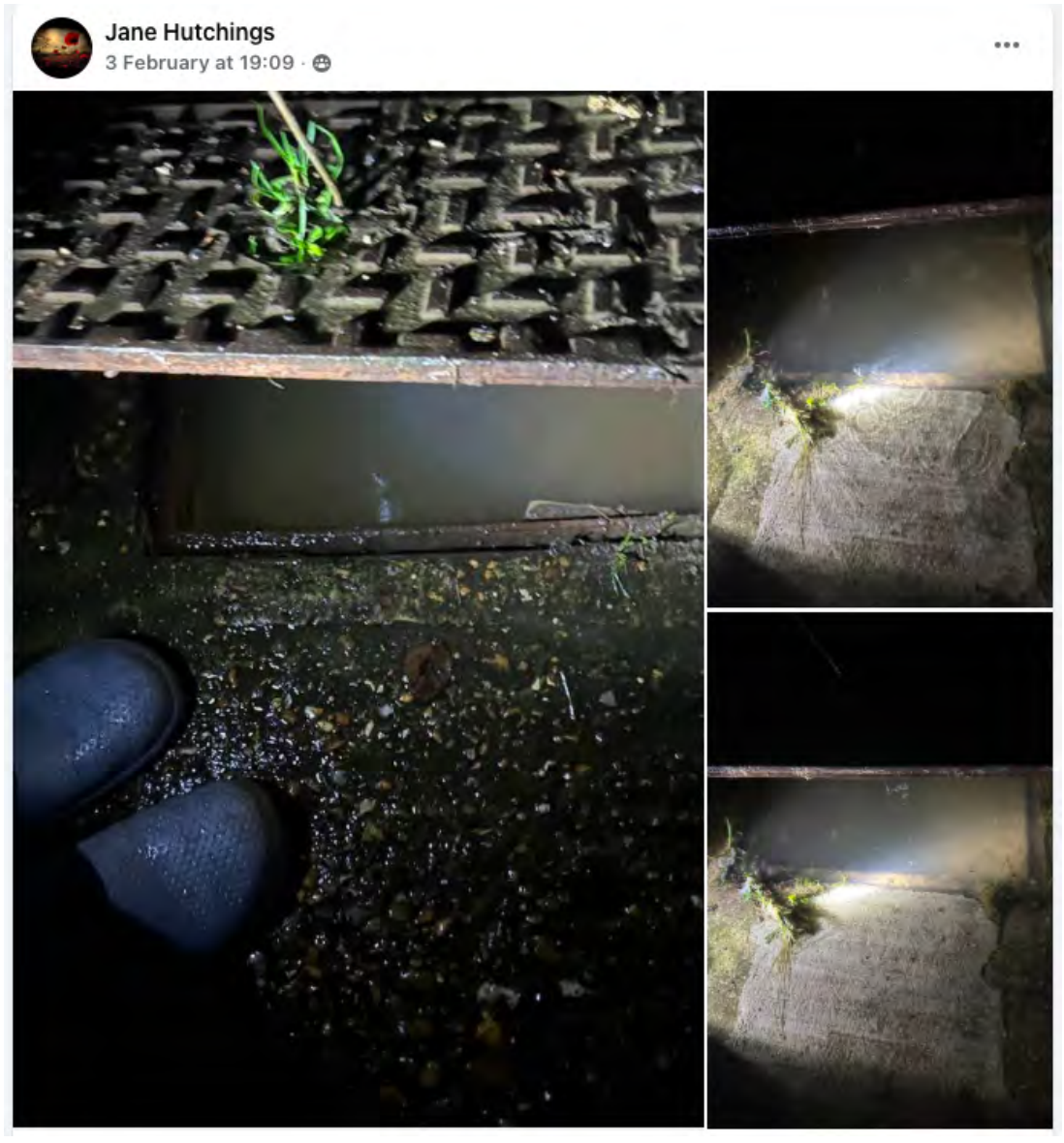
SOUTHBOUND: BARRIERS TIME:	NO. OF CARS IN QUEUE:	HOW LONG TO CLEAR QUEUE:
07.46 - 07.52 (6m)	75	NOT CLEARED - CONSTANT TRAFFIC
07.56 - 07.59 (3m)	31	1 MINUTE
08.20 - 08.28 (8m) (2 TRAINS)	73+	CONSTANT TRAFFIC QUEUE NOT CLEARED.
08.50 - 08.53 (3m)	59	
08.59 - 09.02 (3m)	51	
NORTHBOUND:		
07.46 - 07.52 (6)	71+	CONSTANT TRAFFIC QUEUE NOT CLEARED
07.56 - 08.00 (59) (4) (3)	57	CONSTANT TRAFFIC
08.20 - 08.28 (8) (2 TRAINS)	130	CONSTANT TRAFFIC
08.50 - 08.53 (3)	69	CONSTANT TRAFFIC (NOT CLEARED)
08.59 - 09.02 (3)	90	CONSTANT TRAFFIC

Resident record of vehicle numbers and queue clearing times. 28.01.26 07:45 – 09:15

Resident record of surface water flooding at the bottom of CB2/Hamsey Lane. 28.01.26 07:45 – 09:15

Resident record of surface water flooding at the bottom of CB2/Hamsey Lane. 28.01.26 07:45 – 09:15

Resident record of annual foul water flooding in Chandlers Mead. 27.01.26 11:59



Resident record of annual foul water flooding in Chandlers Mead. 03.02.26 19:09

Northend Stream Advisory Report

WILD TROUT TRUST

wildtrout.org

Northend Stream – Sussex Ouse

Advisory Visit December 2025

By A. Thomas, athomas@wildtrout.org

Executive Summary

The North End Stream in Cooksbridge and Hamsey, East Sussex, is a chalk-fed stream of significant importance, both locally and nationally. A key tributary of the River Ouse, this stream is a rare and critically important spawning and nursery habitat for sea trout and other protected fish species of conservation interest. Originating in the South Downs National Park and an important tributary of the River Ouse which flows through the National Park, it would not be unreasonable to expect this stream to enjoy the very highest levels of environmental protection.

Sea trout are a keystone species of the River Ouse and Sussex, shaping stream-bed habitat and forming a critically important component of Sussex Ouse ecology. They are vital indicators of river and sea health, requiring connected habitat and are genetically unique to the Ouse and its small number of lower-catchment spawning tributaries.

Sussex Ouse sea trout have the largest average size of any trout population running into any river in England and Wales. Sea trout populations are under serious threat from a range of issues. These include climate change, pollution and habitat degradation. Development pressures also pose a significant risk to vulnerable sea trout populations, with this species listed in the Environmental Targets (Biodiversity) England Regulations 2023 and a priority species for recovery in the East Sussex Local Nature Recovery Strategy.

There is irrefutable evidence that sea trout are currently present and active in the North End Stream, as evidenced by the continued presence of large redds (nests of eggs). At any given time, a part of this migratory population will be in residence within the Northend Stream. These may be returning adults on autumn and early winter spawning migration, through to spring-time emigrating smolts. Viable eggs will be laid down in the winter and hatch in the spring as fry. As the year unfolds, these grow into resident parr, with some remaining as small resident adults. A significant component of the population will be present at any given time throughout the entire year.

Protection of the North End stream is therefore of paramount importance. Actions listed in this document should be taken to restore the stream to full health and help build the resilience needed to ensure this population remains viable. Great care must be taken to avoid damage from development or agricultural pressures.

1. Introduction

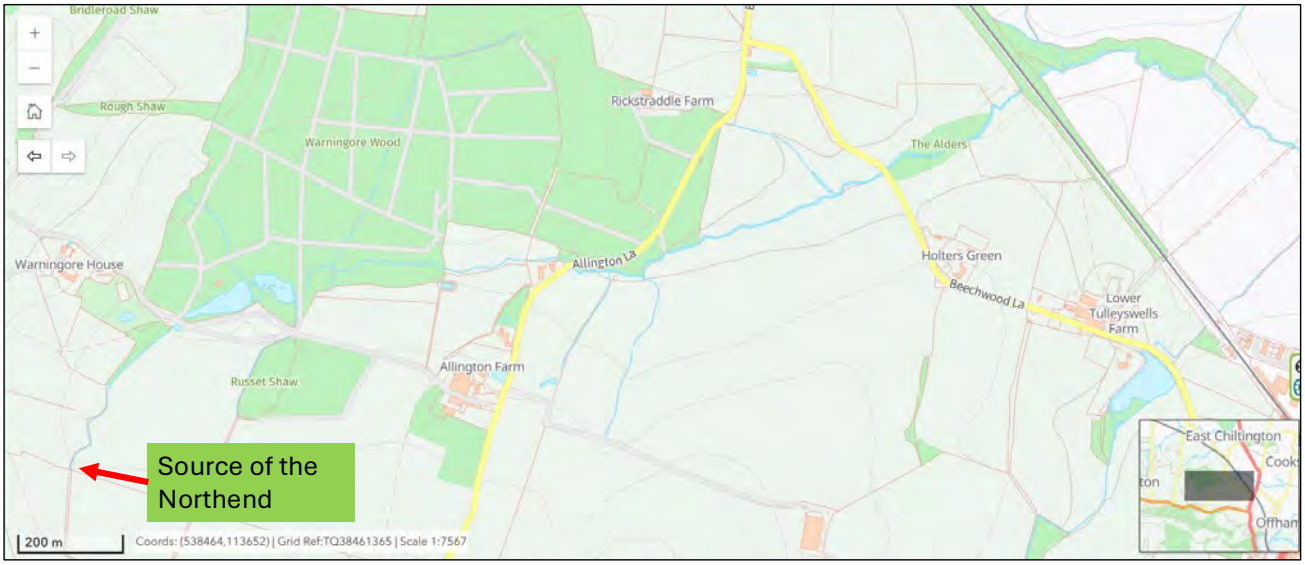
This report is the output of a Wild Trout Trust Advisory Visit undertaken on a 6km reach of the Northend Stream, a significant tributary of the Sussex Ouse. The reach inspected started at National Grid reference TQ 3818 1375, near Warningore Farm, down to its confluence with the tidal River Ouse at TQ4232 1356.

The Advisory Visit was undertaken at the request of Charles Bacchus, Environment Agency Fisheries Technical Specialist for the Sussex Ouse catchment and Mike Deacon. Mike is a local sea trout angler, conservation volunteer with detailed local knowledge of the local Ouse catchment. The purpose of the walkover survey was to evaluate current habitat quality and connectivity, particularly for migratory sea trout *(Salmo trutta)* and identify opportunities for environmental enhancement.

Concern has been raised over a potential change in local land use from arable meadows to the proposed development of 151 houses in fields that border the North End stream and a further 600 houses proposed in the draft Local Plan on fields immediately adjacent to this area, that drain into the stream

Comments in this report are based on observations on the day of the site visit and discussions with key stakeholders

Throughout the report, normal convention is followed with respect to bank identification i.e. banks are designated Left Bank (LB) or Right Bank (RB) whilst looking downstream.



Map 1. Top 3km of the Northend Stream from Warningore to Cooksbridge.

Map 2. Bottom 3km of the Northend Stream to its confluence with the tidal River Ouse.

2. Catchment overview

The Sussex Ouse is an important local fishery and wildlife resource and supports a number of threatened and nationally protected species. The Ouse is particularly valued for its unique, locally adapted sea trout (*Salmo trutta*) population. The Environment Agency and local stakeholders are keen to protect and improve this special population, along with other conservation species, such as eel (*Anguilla anguilla*), bullhead (*Cottus perifretum*) brook lamprey (*Lampetra planeri*) and other coarse fish species. Sea lamprey (*Pertromyzon marinus*) are known to run the Ouse and have been seen in the Barcome Mills area and may well utilise the Northend stream for spawning purposes.

The Sussex Ouse, along with the Adur and Arun forms one of the three unique "gap" rivers flowing within the highly protected downland landscape of the South Downs National Park.

Much of the main river Ouse is heavily modified and impounded by man-made water-level control structures, fragmenting habitat and restricting access for migratory species.

The number and extent of small tributaries that support viable spawning and nursery habitat for salmonids is very limited. Particularly so on the lower reaches of the Ouse, where a combination of the porous underlying geology, coupled with extensive modification of most of the water courses, has resulted in comparatively

sparse habitat availability. All of the small streams that are present have been straightened and dredged and riparian land use in some areas still an issue of concern. Those streams that still have some clean, natural outcrops of spawning gravels and discharge into the tidal reaches of the Ouse are therefore of critical importance in helping to sustain the wider Sussex Ouse migratory trout population.

3. Local trout ecology and habitat assessment and availability.

Northend Stream rises from the toe of the north facing scarp of the South Downs before rapidly swinging east and then south onto the Ouse flood plain, where it carves the gap through the Downs at Lewes, eventually to join the English Channel at Newhaven.

Initially the stream is characterised by a typically straight and shallow form. The straighter nature of the planform is to be expected in the headwaters, where the gradient is steepest. However, the channel has been historically modified throughout its entire length and sits down in a relatively deeply incised channel, with the height of the banks increasing as you go further downstream.

Opportunities for trout spawning are available via occasional outcrops of eroding flint and chert gravels (photo 1), providing opportunities for productive spawning for any fish that can penetrate up, especially into the headwater reaches adjacent to Warningore Farm. Flow and hence readily available access for migrating fish will vary both seasonally and annually, with the perennial source of the stream likely to migrate up and down the headwater valley, depending on autumn/winter rainfall and the critically important groundwater recharge.

Water quality within these headwater reaches is likely to be excellent and the local trout population is genetically programmed to push as far upstream as possible, on autumn/early winter spawning migrations, to hopefully exploit the very best conditions for spawning and fry/parr survival. Sections of stream that either run through, or skirt deciduous woodland, are of particular value. The woody root systems of riparian trees often provide the necessary structure for the streams flow to bite against and carve a varied bed morphology of pool, riffle and glide. In doing so, this provides the optimum conditions for holding adult trout, as well as the essential spawning and nursery habitat that trout require to build the population. Many other stream organisms also thrive on the physical diversity that this type of channel form provides.

The local trout population utilising the Northend stream is likely to be a fully integrated and genetically unique mixture of both small resident brown trout and the fully migratory component of the stock which is reliant on access to and from the sea. Once at sea, these trout wax fat on rich feeding, most likely within the locality of the English Channel, before heading back into freshwater as very large fish, capable of carrying large numbers of eggs. On average, Sussex Ouse Sea trout are known to be the largest sized sea trout running any river in England or Wales.

The strategy of these large hen sea trout is to push upstream as far as they can to obtain a competitive edge over their rivals. Their ability to utilise the high-quality habitat found in the headwaters will vary, dependant on seasonal flow

conditions and whether, or not, the numerous man-made structures (photo 2) comprising gates, culverts and weirs are in a sufficiently "passable" condition. This desire and occasional ability to be able to fully migrate through the whole system applies equally to the large adult broodstock coming back to spawn, as well as the small juvenile "smolts", which usually embark on a springtime downstream emigration to go back to sea. Very little information is available on Sussex Ouse smolt behaviour.

Photo 1. A nest of trout eggs (redd) located right near the very top end of the Northend Stream at Warningore. Evidence that sea trout can currently access virtually all of the catchment.

Photo 2. A typical bridge culvert on the Northend stream. These can be difficult for fish migration, but this example looks to have received a pre-barrage of imported rocks, designed to help drown out the invert of the culvert and give migrating fish a better chance of making upstream progress.

Photo 3. A resident North End Stream brown trout. The resident fish are likely to be genetically integrated with the migratory component of the Ouse trout population.

The numerous road and track culverts, bridge inverts and assorted man-made structures, including the tidal flap gate at the confluence of the Northend Stream with the main river will pose problems for free and easy fish movement. The tidal flap gate and its impact on fish migration is discussed further in the conclusions and recommendations section of this report.

Considerable work and effort is deployed each autumn by a handful of local conservation volunteers to try and ensure that the upstream passage for adult sea trout on spawning migration is not blocked (photo 4). These efforts are heroic and very important. It will also be essential to ensure that smolt escapement is equally possible and blocked culverts pose a particular problem, even when flow appears to be easily passing through. Smolts tend to migrate passively, dropping back with the flow, rather than actively swimming, head-first downstream. Partially blocked culverts, or even very low bridges can induce behavioural problems for smolts and often delay downstream progress. Often, it's not so much a case of "can the smolts drop down" and through a partially blocked culvert but "**will**" they. It is very common for even clear culverts to act as a behavioural barrier and any delay in making downstream progress invariably leads to increased losses through predation, when pods of delayed smolts shoal up and become incredibly vulnerable. These issues become more apparent on sites where the downstream exit of the culvert is perched, or where the passage is made up of multiple small diameter tubes, rather than large diameter tubes that have the invert sunk below downstream bed-levels and have at least some free-board between water levels and the top of the tube, even in flood conditions. Clear span bridges with inverts set below upstream and downstream bed levels are the very best solution to ensure free migration of all species.

Photo 4. The inlet of a partially blocked culvert bridge, subsequently cleared out by the volunteers.

From the middle reaches around Cooksbridge, all the way down to the Ouse confluence, there were numerous examples of high-quality in-stream habitat. A more sinuous planform and sequence of shallow runs and deeper pools were

evident providing opportunities for trout of all life stages. Mature bank-top trees offer additional cover via complex submerged root systems (photo 5).

Naturally fallen woody material (photo 6) was also present within the stream channel. This valuable material also provides opportunities for promoting essential bed and bank-toe scour, helping to clean and free-up fresh gravels for spawning, as well as providing cover and a critically important food source for aquatic invertebrates, thus helping to build the natural food-web.

When woody debris dams naturally form, they can occasionally become occluded with fine brash and leaf material and subsequently upstream water levels will rise. This is when some intervention is recommended. However, the woody material must not be completely removed from the stream but moved or repositioned to allow free flow and lower upstream levels.

In addition to the examples of large woody material, there were also good examples of marginal zones benefiting from trailing riparian vegetation (photo 7 & 8). This is particularly valuable winter cover, especially when it coincides with small outcrops of bed gravels. The combination of a spawning site adjacent to a well-covered shallow margin provides emerging trout fry with essential and extremely valuable cover from predators.

Photo 5. A good example of high-quality stream habitat with complex roots systems provided by the riparian tree and natural bend and pool. Great habitat for adult brown trout to hold up and feed, or a resting zone for a large sea trout on spawning migration.

Photo 6. Large chunks of fallen woody material help to drive valuable natural process and should always be retained when possible. Move it, don't remove it is the key message if it causes a full-channel width debris dam to form. Only redistribute the wood if the dam becomes completely blocked with fine brash and leaves and the upstream bed and water levels begin to rise.

Photo 7. A great example of high-quality trout habitat, with a seam of clean bed gravels adjacent to a light matrix of trailing riparian brushwood cover.

Photo 8. Marginal cover provided by terrestrial plants, including bramble and ivy should never be cleaned out of the channel as it provides valuable winter cover for fish of all life stages.

In several areas, but particularly in the reach just downstream of Cooksbridge, the stream is under pressure from various riparian farming practises, ranging from cattle poaching pressures on unfenced stream banks adjacent to parcels of permanent pasture, through to intensively worked arable fields (photo 9). Uncultivated buffer zones between the field margins and the bank top were very narrow and lacked the complex vegetation and root systems necessary to fully protect the river from pollution by nutrient rich, fine sediment-laden run-off. The sloping topography of some of the adjacent meadows potentially increases the risk of large quantities of nutrient rich soil being picked up during intensive rain-fall event and deposited into the stream.

In one area (photo 10), it looks as though a drainage channel has been deliberately cut into the top of the bankside buffer to assist field drainage. This is very poor land care and soil conservation practice. The topography of this large arable field, and possibly even the direction of tillage, coupled with thin and sometimes non-existent buffer zones means that it's likely to be a particularly challenging reach for viable trout production. Even the farm track and bridge provide a pathway for diffuse pollution (photo 11) threatening the health of the stream below. All of these issues can be easily mitigated via the installation of wide (20m plus) planted buffer zones.

It is understood that a new housing development has been proposed for land that is currently in arable farming production. It is hard to overstate the significant risk that a housing development within the stream corridor could pose to the ecology of this important stream. The impact that arable agriculture is currently having on stream quality can be easily mitigated but the impact of additional surface water run-off pressures and associated disturbance associated with human activity could

seriously impact on the value of the stream as a viable spawning and nursery habitat for sea trout.

Photo 9. A large sloping arable meadow under recent cultivation with only a tiny buffer zone that is too narrow to potentially intercept over-land run-off.

Photo 10. Sloping arable field with buffer zone drainage slot. A direct pathway for nutrient rich sediment.

Photo 11. If arable production is to continue here then the buffer zones should ideally be 20 to 30m wide and planted with trees to help intercept sediment (and nutrient) rich run-off.

Photo 12. Cattle poaching site at the footbridge at the bottom of the first field downstream from main A275.

Significant damage to the streams ecology is being cause by serious livestock bank poaching (photo12). Ideally the bank should have stock fencing set back from the top of the bank and a pasture pump and drinker installed on the top of the bank to reduce pollution pressures in fields where livestock grazing is carried out.

At the confluence of the stream with the main river Ouse, a flap gate (photo 13) has been installed to reduce the risk of tidal flooding into the lower reaches of the stream and adjacent meadows. It was not possible to fully inspect the design of the structure, due to a lack of maintenance of vegetation and for safety reasons.

Tidal gates like this are known to be a huge issue for migrating trout and eel, depending on design criteria. The duration when sea trout can successfully navigate through tidal gates very much depends on their function, design and nature of the tidal cycle and freshwater flow patterns.

These gates appear to be "top hung" gates and if operational will potentially have a much shorter duration of when they are fully passable, unless of course they are partially wedged open by debris, which is entirely possible. If these gates are deemed not worthy of maintenance and in effect redundant, then they should be completely removed to allow a natural flow regime to exist between the stream and the tidal river. If there is a plan to facilitate fish migration through this semi derelict structure, then it certainly isn't obvious.

Photo 13. Top-hung tidal gate at the confluence with the Ouse. Functional or derelict? These gates will have a profound impact on the ecology of the lower section of the stream and the species that need to navigate in and out of the system.

4. Conclusions and Recommendations.

In the context of River Ouse tributaries, the Northend Stream is of critical importance, discharging as it does into the lower, tidally influenced reaches. The tidal flap gate, located at its confluence with the Ouse, is a truly awful structure. This should be removed, or if the flood defence function is deemed essential, then replaced with a modern side hung, or float operated gate designed to facilitate improved access for migrating fish over a wider time-period within the tidal cycle.

The Northend Stream has been very heavily modified, but despite long sections having been dredged and straightened, it still supports some extremely valuable spawning and nursery habitat for trout and other important fish species of conservation concern. The reach downstream of Cooksbridge needs much wider, planted buffer zones to mitigate for agricultural diffuse pollution pressures. Areas that are currently grazed require stock fencing to eliminate bank poaching and again would benefit from thick, complex buffer zones.

There were several poorly designed culvert bridges and structures. Improved access and escape for sea trout smolts could be achieved if these were replaced with clear span bridges, or large box culverts with the invert buried below the downstream bed levels.

Removing the gate and installing a narrow (300mm) deep slot could potentially create an attractive flume of fresh water exiting the stream and is likely to attract interest from migrating fish. Fish passes only ever work well if fish can easily detect the entrance and a modification to this structure could significantly improve access into the system and crucially the behaviour of fish that might be looking for suitable spawning tributaries to run into. Despite the difficulties this semi derelict gate poses to the Northend Stream, it still manages to function as a high-quality spawning and nursey habitat. We know the stream currently supports spawning sea trout, clearly corroborated by the signs of recent spawning activity recorded on the day of the site visit.

A potential change from agriculture to a housing development will pose new and different threats that will be much harder to mitigate. The author understands that there is a local Wastewater Treatment Works that currently services the Cooksbridge area. The Wild Trout Trust does not hold data on the performance record of any WWTW operated by Southern Water. However, it is assumed that the amount of extra effluent potentially generated by any proposed development will place additional pressure on the local works. Any failure that generates the risk of raised ammonia spikes, or biological oxygen demand (BOD) is of concern and could potentially result in the loss of incubating salmonid eggs, or parr residing in areas located downstream of any outfall.

5.0 Acknowledgement

The Wild Trout Trust would like to thank the Environment Agency for their continued support of the Advisory Visit service, in part funded through monies from rod licence sales. The advice and recommendations in this report are based solely on the expert and impartial view of WTT's Conservation Team.

7.0 Disclaimer

This report is produced for guidance; no liability or responsibility for any loss or damage can be accepted by the Wild Trout Trust as a result of any other person, company or organisation acting, or refraining from acting, upon guidance made in this report. Accordingly, no liability or responsibility for any loss or damage can be accepted by the Wild Trout Trust as a result of any other person, company or organisation acting, or refraining from acting, upon comments made in this report.

Legal permissions must be sought before commencing work on site. These are not limited to landowner permissions but will also involve regulatory authorities such as the Environment Agency and Natural England – and any other relevant bodies or stakeholders. Alongside permissions, risk assessment and adhering to health and safety legislation and guidance is also an essential component of any interventions or activities in and around your river.

Saving The Sussex Tiger Report

MAJOR PROPOSED COOKSBRIDGE HOUSING DEVELOPMENTS

Lewes District Council 'Local Plan Spatial Strategy for Development in Our Plan Area', Site Allocation Policies, Cooksbridge
Phase 2 Consultation

Comments on:
Strategic Policy CB1: Land to the north of Cooksbridge (Site ref 11HY)
Strategic Policy CB2: Land to the east of Cooksbridge (Site ref 19HY)

David Bangs <bangs682@btinternet.com> 78 Ewhurst Road, Brighton, BN2 4AJ

PREFACE

I am a field naturalist and author of three books on the landscape history and natural history of this countryside. I have known this countryside intimately for over 65 years. I have helped monitor and survey Sussex Sea Trout spawning activity on an annual basis for 12 years. My results have contributed to the Ouse and Adur Rivers Trust (OARTS) annual redds survey reports. (Redds are the gravel nests of salmonid fish).

I co-initiated and co-led the successful campaign in 1997 against damage to the Offham Marshes and Clayton and Offham Escarpment SSSIs (Sites of Special Scientific Interest).

I co-led the Defend Council Housing (DCH) successful campaign against the privatisation of council housing in Brighton and Hove from 2005-2007.

Below I set out some arguments for rejecting at least a significant part of the two proposed major housing development sites at Cooksbridge.

I have confined my arguments to the issues of wildlife – in this case absolutely crucial - landscape and cultural heritage, though the arguments around housing justice and housing equity are of great importance.

I am not convinced that the current reality of very stressed water resources (in terms of water quantity and water quality) would enable any major housing development in this countryside to go ahead without posing a major threat to an emblematic keystone species of our local rivers and streams – the 'Sussex Tiger' - for which we, in this area, have the responsibility.

I have been present at two Southern Water call-outs within 11 days of each other recently, to the Cooksbridge Waste Water Pumping Station – in the proposed housing sites CB1 & CB2 - for sewage overspills.

At the exact time of the first Southern Water call-out Sea Trout were attempting to spawn adjacent to the sewage overspill.

CONTENTS

1. SAVING THE ‘SUSSEX TIGER’
The unique Sussex Sea Trout and extinction?

1.1. The Sussex Tiger

Here in Sussex we have an apex predator that lives in secret...moves in secret...in dusk and darkness...in cover...in depths of autumn and winter...in storm and flood, hiding in dark pools.

It is a beast of huge beauty...spotted, not striped, with rippling muscle-bound body and thrusting, forward pointing muzzle. A whip of its tail can launch it up waterfalls and rapids. Its teeth are a fierce array….the teeth of a fish hunter, a pointed array of daggers, like those of the swamp fisher dinosaurs that waded the Weald in aeons long gone.

We have the Sussex Tiger here...in our homely Ouse and its streams. It’s always been with us...haunting the Wealden streams and rivers since the retreat of the Age of Ice...12,000 years past….and long before...right through those ice-bound Pleistocene times.

We call it by many names. I’ve called it the Great Beast. Most know it as the **Sea Trout**, the migratory tribe of the **Trout, Salmo trutta**. Till the early twentieth century it was often known as the ‘Salmon Trout’. The origin of that ‘trout’ name probably refers to those sharp teeth. Its Saxon name was ‘Forn’...ultimately from the ancient Sanskrit for ‘The Spotted One’….that beautiful pink and black spotting.

We only just have it. A generation ago fishers would have caught 60 in our Ouse in a season. Now they may catch one. And yet it persists...and by our efforts it revives...and by our damage it declines.

Generations of those who have loved it...have fished for it...and for whom in ancient times it has been vital food...have kept it close. Have kept it secret.

Without huge publicity in our time the true Tiger of Asia and Siberia itself would never have survived. That is now true for our Sussex Tiger.

Our North End Stream, our Allington Stream, our Bevern and Plumpton Mill Streams and more, and the Ouse and Adur that unites them all should long ago have been legally protected...should have been an ‘SSSI’, a ‘Site of Special Scientific Interest’ for our Sussex Tiger’s unique varietal form.

The urge for secrecy is part of the reason for this failure to protectively designate.

Our 'Sussex Tiger' Sea Trout, those of the Ouse and Adur primarily, though sometimes of neighbour rivers, are quite distinct from their cousins anywhere else in English or Welsh rivers. They are bigger: - longer, wider and heavier than others. They can exceed 2ft 6ins / 75cm long and 15.5 lb / 7kg. Those who know the fish can confidently separate a Sussex Sea Trout from its cousins, say, in Dorset. A fishing boat captain off the Dutch coast could make a strong bet that a netted fish is a Sussex Sea Trout. They spawn a month and more later than other varieties, too…in December and January, rather than October and November. It could be called the 'Christmas fish', because it's often seen around then.

It seems likely that the Sussex Sea Trout's distinct and stable form, their distinct spawning window, and other behavioural differences, have a distinct genetic status...likely at the varietal level.

At present The Sussex Tiger faces major existential threats, despite its huge natural charisma.

They are cold water fish and are therefore put at great risk by global warming. Our Brown (non-migratory) Trout and our Sea Trout can survive, but only if we can halt, reverse, mitigate climate change, drastically reverse declining stream and river quality, and halt damaging built developments in their crucial home territories...their river catchments.

1.2. The particularity of North End Stream for its Sea Trout

The North End Stream is known for its larger Sea Trout. (That is, larger by the already-large Sussex Sea Trout standard). Some of these could be Sea Trout which have returned in multiple winters for spawning.

The North End Stream is the first major spawning stream that returning Sea Trout come to after re-entering the River Ouse from the sea. That may make it a favoured option for them.

It is a short stream, and good gravels first appear a mere quarter of a km west of the Ouse confluence. The major gravels complex either side of the Cooksbridge Sewage Works -- **fronting the proposed housing site CB2 -** is little over a mile from the confluence.

There are gravels which may be used for spawning in seasons with strong runs of Sea Trout both in the Tulleys Wells Stream at the western boundary of CB1, and the Cooksbridge Stream at the eastern boundary of CB1, and other spawning gravels only half to three quarters of a km west of the Chailey Road's Cook's Bridge.

The Warningore spawning gravels are a mere 3 miles / less than 5km from the confluence.

The short journey times to the spawning grounds give the North End Stream an enhanced value for spawning Sea Trout.

1.3. Current damage to water quality in the North End Stream

The North End Stream is also – for its head streams, and in relative terms – a clean water stream. Its gravels so far escape the waving coatings of brown filamentous algae that have dogged the Bevern Stream gravels in the last decade.

The Bevern Stream, to the north, is still the matriarch of all the Ouse spawning streams, but she is in painful decline. She is dogged by the presence of the growing settlement of Plumpton Green on her key headwaters - and the possibility of much greater new settlement at 'Eton Gate'. Her daughter stream, the Plumpton Mill Stream, has been dogged by the presence of Plumpton Agricultural College. Both the College and the village have been the source of a long roll call of pollution incidents...some, like that of late 2016, of catastrophic quality.

Yet the North End Stream is fronted by the Cooksbridge Waste Water Treatment Works (Sewage Works) and staff were brought out only a few days ago for a sewage spill. Whilst Southern Water's people worked to repair the damage, a large Sea Trout held station next to her redd (gravel spawning nest) and a second Sea Trout held station close by.

Fishers report that (paraphrase) "**every time there's major rainfall the Sewage Works overflow**."

These repetitive pollutions are the current reality, BEFORE any mile-long fronting housing development.

It is obvious, too, that **current arable and grazing practice** on the slopes fronting the stream, north of Cooksbridge and on the Ouse flood plain, is not best managed for its water quality. It can be the cause of problems of soil and agri-chemical ingress into the stream, and consequent silting and compaction of gravels. However, change of land use from arable to permanent pasturage or haylage, or fencing and diverting grazing stock from stream edges along the Stream's flood plain corridor, can be straightforward and rapid if it is decided to make that change.

Current farming usage is of far, far less significance as a long-term problem for the Stream than the proximity on slopes adjoining of a major housing development.

Poor farming practice can be reversed. Major adjoining housing development cannot be reversed, and may well be later ramified by further development.

The integrity of the North End Stream and its contextual countryside is now the new 'front line' for the survival of the Sussex Sea Trout.

1.4. The threat at Cooksbridge

1.4.1. Extended urban proximity to critical stream section.

The proposed housing site forms an almost 1 mile / 1.5km line close to the southern side of the North End Stream, as well as the Tulley's Wells Stream and the Cooksbridge Stream. For almost half a mile / 0.75 km the proposed development site (CB2) has its frontage right on a crucial section of the Stream, at the base of the slope descending north and north east from Hamsey Lane and the Cooksbridge built-up area.

The proposed housing would come right up against some of the key spawning sections of the North End Stream. This January there are eight or more redds (Trout nests) in the wooded gill section west and east of the Cooksbridge Sewage Works.

All Sea Trout making for the Tulleys Wells, Allington and Warningore spawning gravels must pass the Cooksbridge section of the Stream to spawn.

This fronting will bring an immediacy of threat from the close proximity of pollution sources, invasive species, poaching, and disturbance.

1.4.2. Drainage, run-off, pollutions.

A modern sustainable urban drainage system for new housing on those slopes will be proposed, with all its corollaries of settlement ponds, and so on.

However, the period in which we are living is characterised by service break down. The adequacy, security and permanence of ameliorative measures can no longer be taken for granted. Old protections, old assumptions about nature and natural resource protection are under constant review and subject to roll-back. Funding for nature and the political status of the protection of nature is under sustained attack.

In this context even the very best sustainable urban drainage system on these sites will remain vulnerable to possible break down in the future.

This makes the future of the 'Sussex Tiger' and the health of the North End Stream in the face of adjacent major housing development **a hostage to fortune.**

1.4.3. Water system.

Unequal and uneven patterns of development and hyper-development create huge pressures on water supply and water infrastructure here in the south east. Locally our streams, rivers and reservoirs have been under extreme pressure from this heightened demand and new sources of pollution.

New patterns of droughting and extreme rainfall events put huge pressure on this stream and river system.

Locally this is expressed by greatly heightened pollution levels, low flows, warming summer waters, the drying out of head streams and spawning gravels, erosion of redds (nests) by repeated major rainfall spating, and damage and break down of water infrastructure. The Sea Trout in-stream food supply (for instance of river flies) is in decline as water quality and surrounding habitat declines. Sea Trout suffer poor condition and juvenile mortality.

Greatly increased nearby housing will greatly add to these pressures, as can be seen by the decline in the quality of the Bevern Stream in the face of increased housing provision.

1.4.4. Disturbance and poaching.

Very small levels of disturbance during spawning, egg development, and juvenile development of fry and parr (young trout) could do great harms. Presence of dogs, childrens' and adults' exploration

and play in-stream and adjacent to the stream, water disturbance, tipping, and new inadvertent pollutions could do great harm.

Stream long used by Sussex Sea Trout for spawning has ceased to be used in recent years because of disturbance from increasing bankside human footfall and dog ingress.

Poaching of young trout before they develop as smolts (Trout in a form ready for migration to the sea) and Sea Trout is already a problem on local streams.

Of course, trout and other migratory fish, such as lamprey, eel, mullet (and even seals) pass through urban areas, such Newhaven and Lewes, Shoreham and Steyning, on their way to up-river feeding and spawning grounds...

However, the river and its urban sections are not where the Sussex Tiger spawns.

For that it needs high quality countryside free of significant threats of pollution or disturbance.

In that it is like the real Asian Tiger. A peppering of relict forest nature reserves will not save the Tiger. It needs wide ranging forest matrices in which to wander. It needs to be able to reach beyond itself.

In this it is like our Sussex Tiger, which, in good seasons can reach up every running ditch-stream, through tunnels of trees, and up streams which look far too small to accommodate it. It needs a countryside rich in semi-natural habitats that can support the life needs of its prey species of caddis, crustacean and river fly, and other small fishes.

It needs an intact semi-natural countryside context in which to survive.

1.5. The unpredictability of future threats.

The recent severe decline of great Salmonid rivers like the River Wye was not predicted.

The Wye has long had statutory protection in two extended riverine SSSIs (Sites of Special Scientific Interest) and even higher level protection as an SAC (Special Area of Conservation). Yet in a couple of decades a dramatic increase in free range chicken farming and intensive dairy farming has brought ruin to the river and widespread national outrage.

Neither free range poultry farming or dairying were culturally or politically considered as great environmental threats until recently.

New threats to our local Sea Trout streams are similarly unpredictable.

Yet they will appear, given the unplanned nature of economic and political development.

This means that special measures *on a wider scale* are necessary for the survival of the linear river system.

1.6. Is a protected linear river corridor sufficient protection?

It may be proposed in mitigation that a linear river corridor is sealed off from the housing development for the sake of the Sea Trout and other wildlife.

We must ask if that is intrinsically tolerable. Do we want to 'cage' our Sussex Tiger, and 'cage' us as its neighbours, to ensure its survival?

In a wide corridor of good semi-natural countryside, however, it is entirely possible to manage the impact of us humans in ways that enable our freedom to wander and the ability of the threatened Sussex Sea Trout to survive.

1.7. Providing secure countryside for the Sussex Tiger in perpetuity.

The housing development proposals need to be rolled back to exclude all of the south slopes of the Vale of the North End Stream. (That is, its north-facing slopes).

The edge of the built-up area at Chatfield Close, west of Cooksbridge Road, A275, should form a limit of built development northwards. To the east of Cooksbridge Road, A275, Hamsey Lane should form a limit of built development north and north eastwards. **Both boundaries roughly mark the upper edge of the North End Stream Vale.**

Such boundaries would be robust and defensible in terms of holding back part-natural and human harms from the Stream and its immediate environs of carr woodland, ancient woodland and open land.

SEE MAP THREE

2. LANDSCAPE: THE VALE OF THE NORTH END STREAM AND THE VALE OF THE OUSE RIVER

2.1. Protecting the Vale of the North End Stream

2.1.1. Land to the north of Cooksbridge, Site ref 11HY, 8.4 ha / 21 acres. Strategic Policy CB1.

This housing site allocation is shockingly destructive of the integrity of the North End Stream Vale.

It will fracture the Vale at this point. This allocation should be deleted.

SEE MAP THREE.

The North End Stream is unencumbered by significant settlement or built development from its confluence with the Ouse all the way west to Warningore Wood. It is only some three miles long as the crow flies (and an extra half mile as the water wanders).

It is this significant absence of modern built detractors that has enabled the Stream to survive in such good shape into the present.

The small sewage works east of Cook's Bridge is the first significant built detractor (a regular source of pollution) it meets in its journey east to the Ouse. The 180 year old railway causes only

limited severance of the Vale, and even at some points provides additional important woodland, scrub and tall herb vegetation to supplement the value of the stream corridor for wildlife (such as wetland-dependant wintering Woodcock, springtime Nightingale, amphibians and so on).

The current view from Cooksbridge Farm southwards, and from the built-up edge of Cooksbridge northwards is of a gentle riverine vale. It is a soft and expansive view of plough and pasture, bush and tree to the west, supplemented by carr woodland to the east. It is a big view of gently descending horizontals, punctuated by alder and thorn, shaw and bushed gully, and old farmstead.

It is a classic Low Wealden viewshed, emphasising horizontality, soft and green, and nuanced by two clefted streamlets, the Tulleys Wells Stream and the Cooksbridge Stream. Its slope displays its geology...gault clay to the south and greensand to the north and around the Stream. It is this greensand which makes the stream accessible and the land easy to work and walk.

It is seen and enjoyed by many travellers, by car, cycle and Shank's pony. Going north from Lewes it is the first point where the Low Weald opens up in a vista (as opposed to the backdrop of the Downs scarp). **Viewpoints** from Cooksbridge Farm and the edge of Cooksbridge are much valued by travellers of all kinds.

Such fluvial vales, which retain centuries-old complex palimpsests of tree'd boundaries, flood plain meadows, woods, hedges, cropped and pastoral farmed land, streams and old farmsteads, are a critically important part of the Low Wealden landscape identity.

In any other English region this strong and relatively intact historic cultural and semi-natural landscape would long ago have brought the designation of the Low Weald as a National Landscape.

It is only the proximity of the High Weald National Landscape and the South Downs National Park which makes this areas a target for built development. It is squeezed between two nationally protected landscapes. Capital's development opportunities have been squeezed into this adjacent area because it has the weakest protective landscape designations.

2.1.2. Land to the east of Cooksbridge: Site ref 19HY, 61 ha / 152.5 acres.
Strategic Policy CB2.

All of the housing allocation land to the north of Hamsey Lane should be deleted from the Cooksbridge proposals. It abuts the North End Stream for three quarters of a kilometre.

SEE MAP THREE.

An area of proposed low density housing (perhaps 200 units?) clusters to the north of Hamsey Lane, around the hinterland of the Sewage Works. This proposed housing area should be deleted.

Nevertheless, in this draft Local Plan (page 86, map 23) it is proposed that the majority of these north east facing slopes should be excluded from housing development.

This is praiseworthy and very welcome.

However, such limits on the footprint of built development in this site allocation will be subject to dispute, perhaps with the developer, perhaps with the landowner, and perhaps in Lewes Council and beyond, both now and in the future.

For that reason it is necessary to reiterate the case against any built development of the southern slopes of the North End Stream Vale, as below.

Part of this larger **site allocation ref 19HY** covers a large area of the southern slopes of the Vale of the North End Stream dropping from Hamsey Lane north eastwards down to the Stream, or not far from the Stream. These are the north east facing open pasture Vale slopes from close to the Sewage Works, eastwards as far as North End Lane at one point.

It also includes all of old Hamsey Common, TQ 407133, which retains nearly all of its boundaries and two public footpaths. It was informally lost as a common some time in the 19th century, but could be readily restored.

These are delightful riverine Vale slopes. They are inter-visible with ornamental Conyboro Park and its planted specimen trees, and old Avery's slopes of the receding Vale around the small Conyboro Stream and its head streams to the north, reaching into the south Barcombe landscape.

It is a landscape of hedgerow and hedge tree, of small broad-leaved woods, and brush-lined head stream gullies, old farmsteads and cottages. Its good soils give it a mixture of plough and pasture.

It is productive and beautiful.

It is a landscape of rough corners and wet sloughs, sandy plats, gnarled oak and outgrown sallow stools, noisy flowing stream-ditches and bracken banks.

Its gentle corrugations are the core marker of this Low Wealden Vale landform. Their nuanced horizontality and its expanding and open expression reinforce the tranquillity which is so evident here.

Green and gently corrugated horizontality means peace. It is a physical expression of peace.

Major built development here will do catastrophic harm to this ancient landscape matrix of stream, and long-enclosed field, hedge, pasture, oaks, alders, sallow, slough and rough.

2.2. Protecting the Vale of the Ouse

2.2. Land to the east of Cooksbridge' (Site ref 19HY, 61ha / 152.5 acres). Strategic Policy CB2.

This housing site allocation invites an inadequate perception of the actual footprint of built housing proposed in this Lewes Council draft Local Plan consultation document, in relation to the Vale of the Ouse.

In this document (page 86, map 23) it is proposed that the south east facing slopes of the Ouse Vale (that is, the Vale's western slopes, down to The Drove and its railway level crossing, and to Hamsey hamlet) should be excluded from housing development.

This is praiseworthy and very welcome.

However, such limits on the footprint of built development in this site allocation will be subject to dispute, perhaps with the developer, perhaps with the landowner, and perhaps in Lewes Council and beyond, both now and in the future.

For that reason it is necessary to reiterate the case against any built development of the western slopes of the Ouse Vale, as below.

The south end of the Low Wealden Vale of the River Ouse is a huge, inter-connected viewshed of open alluvial flood plain and its low, containing countryside of rolling clay and greensand hill and plateau.

The scene recedes in ordered planes to a bounding backdrop of the great wave of the southern line of the South Downs scarp in the Caburn outlier and the Offham promontory.

At this southern end of the Vale, before it meets the Downs, it is largely – but not completely – a wood-less countryside of plough and pasture. Much of its flood plain is relatively free of hedge and limit, and has been so perhaps as far back as Roman times and even earlier. Ditched drains control livestock and form boundaries, not hedges or shaws.

This woodlessness has been associated with long settlement and past industrial activity...though all those waves of industry never destroyed this essential openness and its rich wildlife. Nature and people have accommodated each other relatively well, here, until the second half of the 20th century.

The Roman townlet at Wellingham (probably a river port for the High Wealden iron industry), the medieval and early modern mill complex at Barcombe Mills, the early modern quarrying industry between Landport and Offham, early modern drainage of the Brooks, then the Ouse Navigation, then the railways all left marks, but with an extraordinarily limited effect on landscape and landform naturalness.

The deep historical continuities are greater than those marks of human settlement. The 200 acres of meadow and pasture in Domesday Book Hamsey in 1086 are of the same order as that of the present.

It was largely flood plain open pasture and higher ground corn and livestock farming back at the time of the Domesday Book. It is still largely that now.

Still it is tranquil.

Still the lanes of the Vales of the North End Stream and Ouse are little used by motor vehicles.

Still they are preferentially used by cyclists and walkers...for that reason.

Still they are largely safe for children.

This dramatic landscape value was judged of national significance by the designation of the Malling and Hamsey Brooks and the promontory of Hamsey's church as National Park ground.

Yet the raw Cooksbridge proposed development site allocation leapfrogs that protective intention and poses a critical threat to the integrity of the Ouse Vale.

The proposed development footprint covers the Ouse Vale's slopes above The Drove, above Hamsey hamlet, above North End Lane and above the North End Stream.

It breaks open the containment of the Vale and destroys the intention of the National Park boundary in protecting this part of the Low Weald.

Great harm will be done if built development is permitted on these Vale slopes.

3. UNRECOGNISED WILDLIFE AND HERITAGE: two points

3.1. Unrecognised linear ancient woodland gill on the North End Stream

The section of the North End Stream west and east of the Sewage Works, **bounded by housing allocation site ref. 19HY, land to the east of Cooksbridge**, passes through a **wooded gill, with ancient woodland cover**.

The gill is a bit more than a quarter km in length, and lies between c. TQ 4043 1378 and TQ 4072 3076.

It has two outstanding veteran Oaks, a suite of ancient woodland vascular plants, and a varied high value stream length. These ancient woodland flowering plants include Soft Shield Fern, Bluebell, Wood Anemone, Primrose and a large Gean, Wild Cherry clone.

'Gills' are deeply incised mini-ravines. They are often wooded, and this woodland is mostly ancient. (Indeed, it may be primary in some places, that is, without any episode of human clearance).

They are a characteristic and extremely high value natural feature of the Wealden Vale. The vast majority of them are within the High Weald. Our Wealden gills have very few English corollaries. They are internationally rare.

However, a rising number of gills, mostly with ancient woodland cover, have been identified in the Low Weald. They are often missed. This gill's woodland does not appear on the ancient woodland register. (Quite long lengths of linear riverine ancient woodland may go unrecognised, such as more than a mile of the River Mole just south of Gatwick).

This gill has a very steep southern slope, dropping perhaps 25 ft, and a tall, vertical northern bank. It has a stream length of excellent naturalness, with a suite of meanders, riffles, exposed gravels, glides, shaded overhangs, pools, and varying depths.

Perfect habitat for Sea Trout.

3.2. The heritage of the Age of Dinosaurs

At the southern end of **Site 19HY, Land to the East of Cooksbridge**, the land slopes down towards The Drove, the railway level crossing, and the flood plain below. This slope has a shallow combe upon it, around TQ 405 125, which is made less noticeable because the combe is interrupted by the railway line. (This combe continues on the far side of the Railway, within the National Park, through Offham village to form Offham Combe in the scarp face of the Downs).

This slope and combe form part of an outcrop of the Lower Chalk, also called the Grey Chalk, which constitutes the oldest and earliest chalk strata. It is around 96 million years old, and is within the Upper Cretaceous, the last part of the Age of Dinosaurs..

This spot is extremely rich in fossil Ammonites and other marine cephalopods, as well as ocean floor fossils. These fossils appear on the surface when the slope and the field below it are ploughed, and can be very frequent.

Gideon Mantell, the famous Lewes palaeontologist after whom many fossil species are named, and who shared responsibility for the recognition of the Iguanodon dinosaur, would undoubtedly have known this exposure. Indeed, he was co-responsible for the naming of these chalk formations.

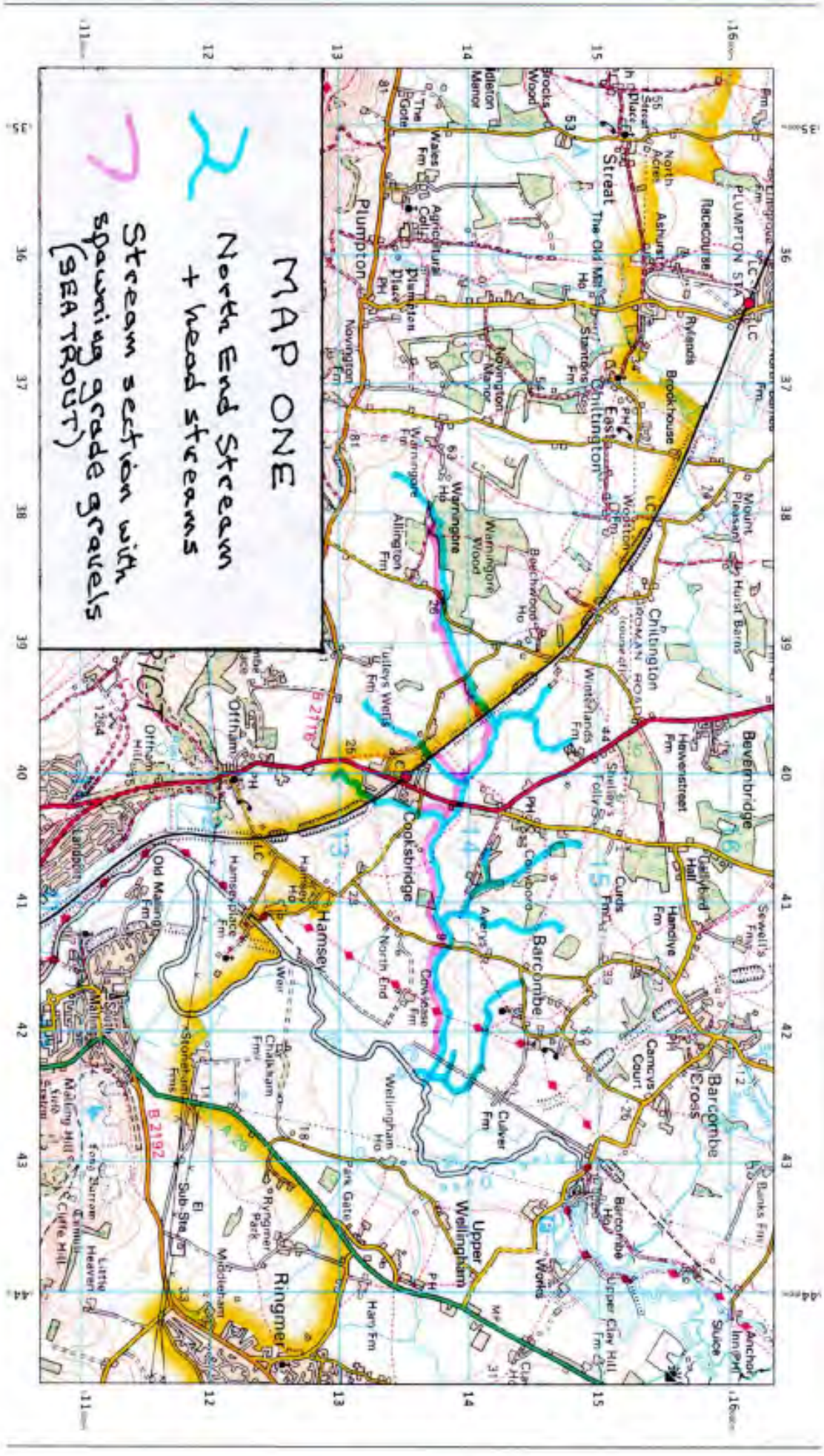
These fossils are of the West Melbury Marly Chalk Formation, within the Cenomanian Stage of the Cretaceous. The characteristic Ammonite of its middle period, **Acanthoceras rhotomagense**, is present in this exposure, with many others, such as **Mantelliceras dixoni, Calycoceras guerangeri, Hamites simplex**, and the common **Schloenbachia varians**.

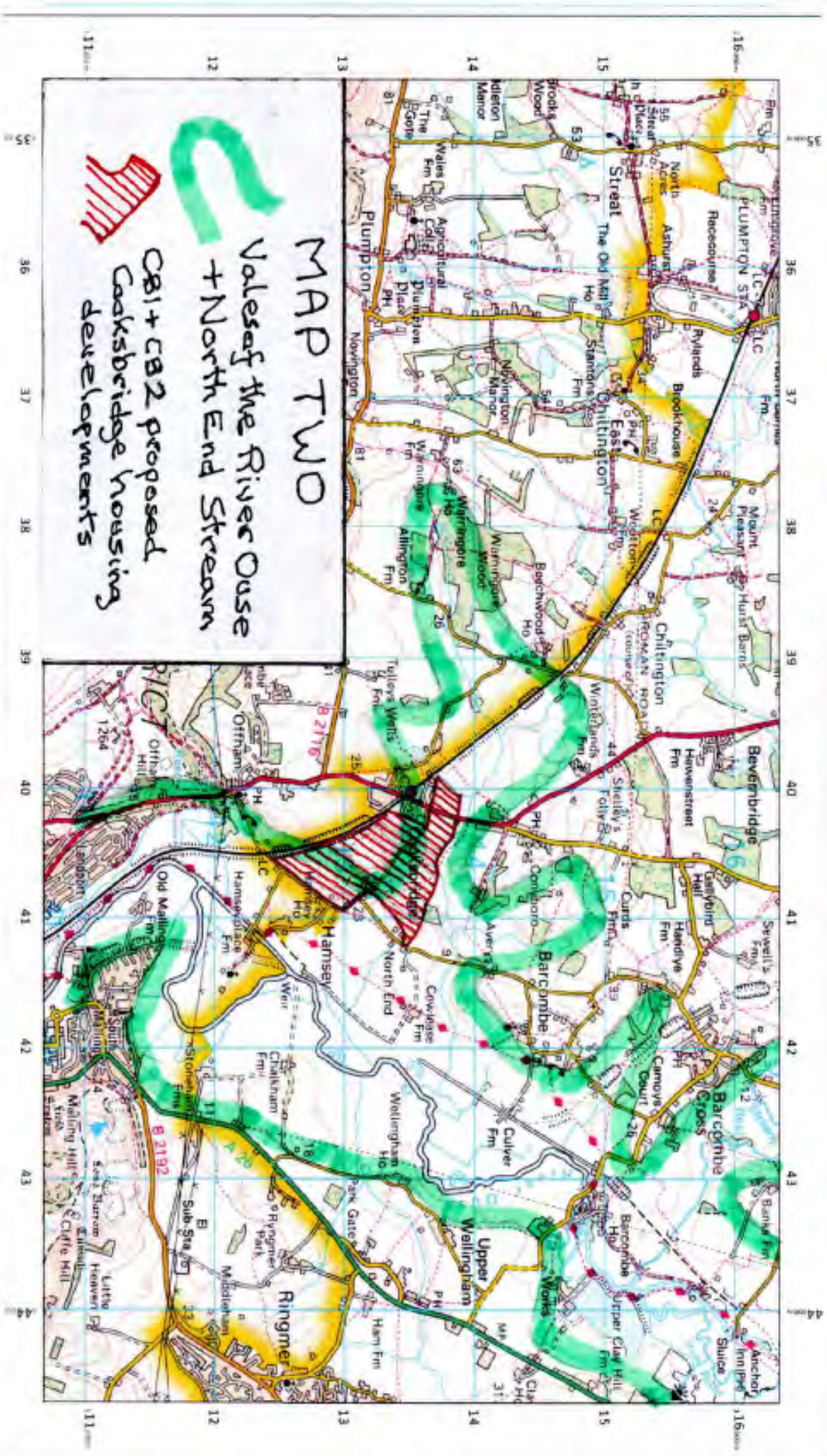
Some of these Ammonite species are quite large in relative terms. They look like model **tractor tyres.**

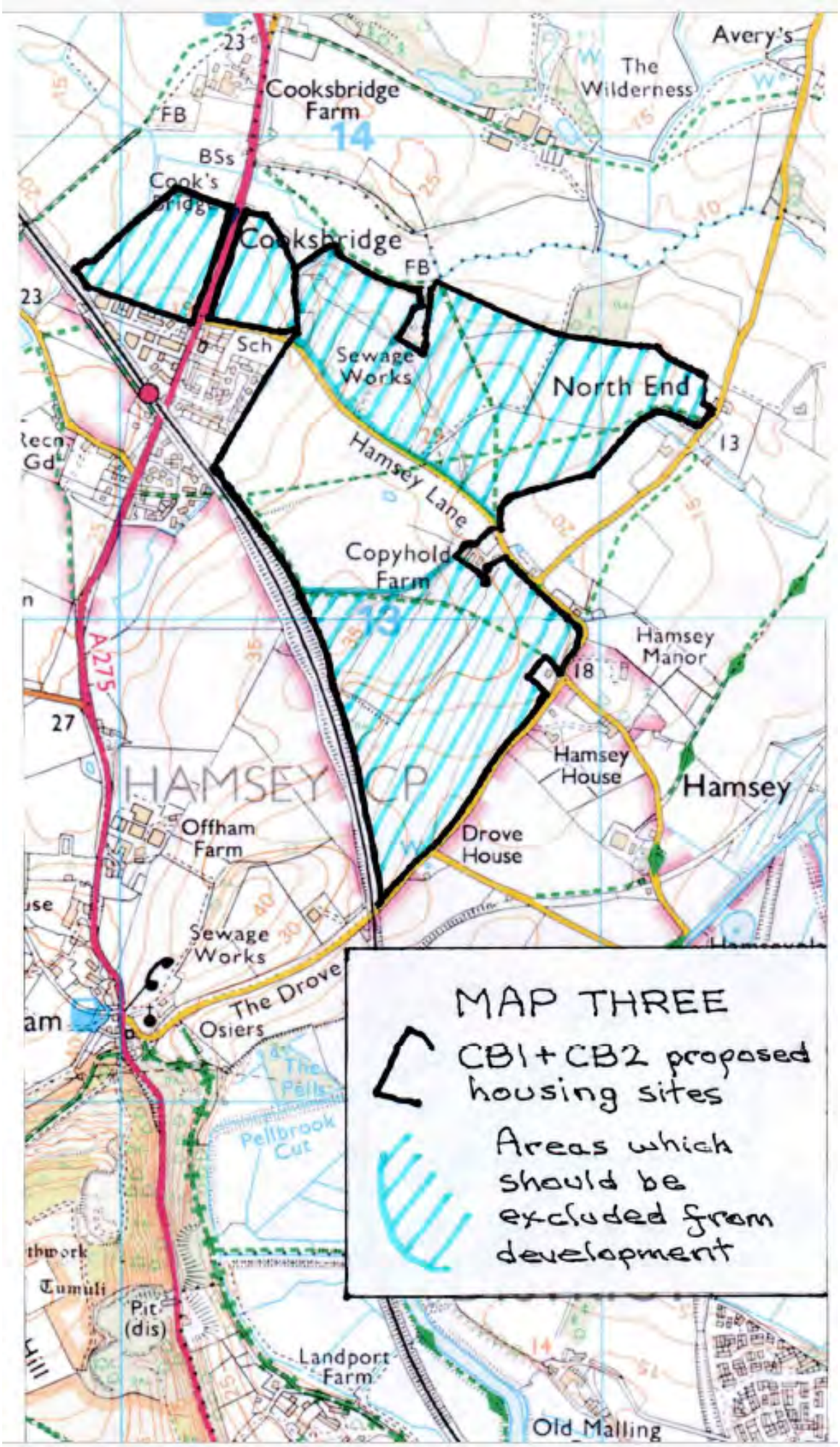
There are **Nautiloid** species (cephalopods), little **Brachiopods** (an extremely ancient Palaeozoic life form) **sponges, serpulid worm casts, bivalves, coral**, and much more.

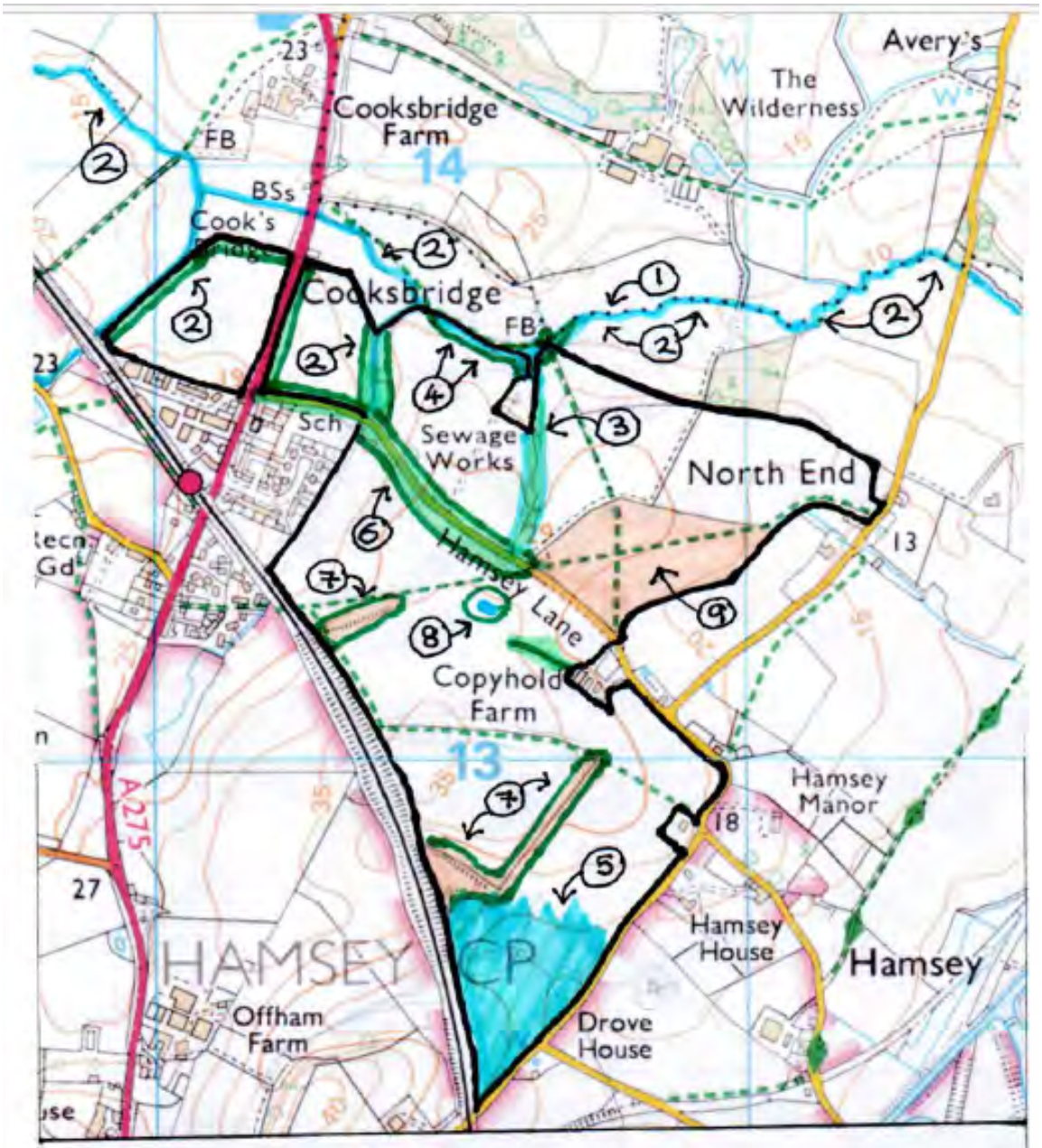
Intermixed with fossils of the West Melbury Chalk are fossils of the younger and higher Zig Zag Chalk Formation. They must have been washed down from that higher strata, up in Offham Combe, probably in the Age of Ice, the Pleistocene. The bivalve mollusc **Inoceramus pictus** is one of these. (PICTURE).

This exposure should be preserved from built development. Such species-rich accessible exposures are scarce, and should be recognised and valued.


MAP ONE
North End Stream
+ head streams
Stream section with
spawning grade gravels
(SEA TROUT)
Streat
Plumpton
Chiltington
East Chiltington
Beverbridge
Cooksbridge
Hamsey
Barcombe
Barcombe Cross
Upper Wellingham
Ringmer
PLUMPTON STA
B2116
B2192


MAP TWO
Valley of the River Ouse
+ North End Stream
CB1+ CB2 proposed
Cooksbridge housing
developments
Streat
Plumpton
Chiltington
East Chiltington
Beverbridge
Barcombe
Upper Wellingham
Ringmer
Offham
Hamsey
Cooksbridge
North End
B 2116
B 2192
A 26


Avery's
The Wilderness
Cooksbridge Farm
FB
BSs
Cook's Bridge
Cooksbridge
FB
Sch
Sewage Works
North End
Hamsey Lane
Copyhold Farm
Hamsey Manor
A275
HAMSEY CP
Offham Farm
Hamsey House
Hamsey
Drove House
Sewage Works
The Drove
Osiers
The Pells
Pellbrook Cut
Tumuli
Pit (dis)
Landport Farm
Old Malling
MAP THREE
CB1+CB2 proposed housing sites
Areas which should be excluded from development



MAP FOUR

1. North End Stream
2. Streams likely used by Sea Trout (with gravels)
3. Feeder Stream to North End Stream
4. Linear ancient woodland + Low Wealden gill
5. Rich Ammonite fossil site
6. functional linear laneside woodland
7. Lynchets with woody vegetation
8. Rich pond recorded c.1870
9. Hamsey Common - enclosed but with boundaries + footpaths

Great Beast

**On finding the corpse of a giant cock Sea Trout kelt[i],
2.5 ft. long, 6.5 in. wide, and 10 - 15lb weight. 12/12/15.**

Dave Bangs, Tel. (Brighton) 01273 620 815 <bangs 682@btinternet.com>

We tracked the stream's edge through blackthorn brake[ii], and by muddy path,
Teetering on high banks, leaping the mud slides where deer slots[iii] reveal their night-time fordings.

The dark of oaks and ashes conspires to make our way more dusk than day
And keeps us to the water's mirror light,

And there, within this gloom, the white-pale branch of you
Lies still - lies stiff below the spate...a log beneath the surface,
Lodged up against a fallen oak.

I stop.
I see your line of mouth, your rounded eye...

We haul your strong and slippery corpse and lay you on a bed of autumn leaves.
We gaze.
You wear your smartest courting suit, be-speckled head to tail in pink and black;
Your fins have tips of varnished Prussian blue and silver;
Your dainty teeth are strong white thorns;
Your fierce great kype[iv] a battle sign.

I measure. We touch you, laugh, pose pictures with you, puzzle why your life has stopped...

...So busy only yesterday, parrying your rivals,
Winning your fem; lying at her side in nest of stones
And emptying your twinned bodies.

...What was it like, old man,
To duck the bridges, shoot the sluices;
To dare the races, fight the spates;
To leap the weirs?

Is that where those scratches came, criss-crossing your white belly?
...Where your leap had failed; your body bounced off stone or scraped down concrete?

What was it like to feel the salty tang get stronger mile by mile;
To leave the river's mouth and break again to open sea?

What was it like
To hear ship motors up above;
To see the sea birds' bellies bob and dive against the sky;
To fear the spreading nets?

What was it like
To live in furious seas and roaring winter waves?

What perils did you pass, what terrors beset you from your gravelly birth?
...From spider-legged damsel larvae;
From lightning kingfisher's dive;
From heron's rapier beak;
From pike's torpedo rush;
And angler's jittering silver lure.

What was it like
To feel the lengthening of the days,
The urge for natal stream;
To pass again through river mouth
By dredgers, lights; by wharves,
And hear the roar and growl of cars and lorries?

Return you did, and then again, with others of your kind,
Up reedy narrows, between steep banks,
Up tunnels of trees, beating up trickles with scarce more flow
Than ditches – gravel bottomed drains where bramble draped above
And tangled fallen timber, poles and leaves threatened your way,

And there, with back scarce cloaked with water, you splashed in coupling frenzy,
Whilst dogs barked in cool night air to hear your noisy labours.

I lift you up and bear you to the bank, and tip your body down,
Where with great splash you hit the water one last time,
And, as the clouding clears, lie once again below the water's rush.

...And, that night, you filled my dreams with wonder
That you still made your journey back to Wealden wooded stream,
In face of all we do to kill your world.

Great beast, you touched our lives.

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i A kelt is a spent and emaciated trout or salmon after spawning. They may die after these exertions, or they may return to the sea and regain condition.
ii A brake is a thicket.
iii Slots are hoof prints, particularly of deer.
iv A kype is a hooked growth on the end of the lower jaw of the male adult trout or salmon which helps him ward off competitor males when courting.