

Planning North

From: DoNotReply@lewes.gov.uk
Sent: 12 September 2016 19:44
To: Planning ldc
Subject: Comments for Planning Application LW/16/0695
Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 7:52 PM on 12 Sep 2016 from Mr David Bangs.

Application Summary

Address: Land South Of Chiltington House Chiltington Lane East Chiltington East
Sussex

Proposal: The creation of ponds (part retrospective) and the provision of associated buildings with a supervisory dwelling to service a fish farm producing caviar. Planning permission for the dwelling (only) sought initially for three years in order to demonstrate enterprise viability

Case Officer: Mr Andrew Hill

[Click for further information](#)

Customer Details

Name: Mr David Bangs
Email: 
Address: *Ewhurst Road Brighton*

Comments Details

Commenter Member of the Public **Type:**
Stance:

Reasons for comment:

Customer objects to the Planning Application

- Building in Countryside
- Conservation Significance
- Contextual Significance
- Contrary to Policy
- Drainage
- Effect on AONB
- Effect on Wildlife
- Highway Hazards
- Historical Significance
- Inadequate Access
- Loss of Open Space
- Noise and Disturbance
- Not Sustainable
- Out of Character
- Over-development
- Overbearing Building/Structure
- Parking Issues
- Traffic Generation

Comments:

From: Dave Bangs

Author and field naturalist

To: Lewes District Council
Planning and Building Control

Dear friends
Planning Application Ref: LW/16/0695
Land south of Chiltington House,
Chiltington Lane
Sturgeon / Fish Farm: MY OBJECTION

1. BACKGROUND

I am a Brighton resident who has walked the Chiltington countryside for more than fifty years. I walk and take my family and my grandchildren along the Bevern Stream and the Romans Winterbourne on a regular basis.

The public qualities of this landscape

The landscape in which this site sits has a high level of tranquility. It has a very rich and relatively intact pattern of historic landscape features, which includes its streams, small hedged fields, shaws, small ancient woods, and vernacular cottages, farms and barns. Its qualities in this respect merit the level of recognition and protection offered by National Park or Area

of Outstanding Beauty designation, and it is anomalous that they are excluded from both the neighbouring areas with such designations (the South Downs NP and the High Weald AONB).

Large parts of this landscape are informally walked without hindrance from excluding landowners, and, in particular, the neighbouring landowner to the applicant has a record of benevolent tolerance towards sensitive public usage. Remarkably, several of its lanes, particularly Chiltington Lane, can still be walked safely with children, or cycled.

Most of this landscape is rich in wildlife, and its streams are exceptionally rich, being principal nursery streams for a famous and vulnerable race of Sea Trout. (They are of greater size and later spawning, and have a distribution centred on the Ouse and Adur catchments). The Bevern Stream and its tributaries is one of the principle nursery areas for this local race.

The Bevern Stream and the Romans Winterbourne have a good assemblage of 'wild fish' (as opposed to non-native species) including Minnow, Bullhead, Stone Loach, Three Spined Stickleback, Eel, and both Brown and Sea Trout. Grey Heron and Kingfisher depend upon these small fish and can be seen daily. Wintering Woodcock are present, sometimes several together, along the Romans Winterbourne and the Bevern Stream, and the same individuals appear to return year on year. Cuckoo and Nightingale are present, although their presence gets less reliable as they succumb to multiple threats.

I have myself found one, possibly two, Sea Trout redds (gravel nests) in early 2016 on the Romans Winterbourne, just south of the Application site and the railway line, and several local residents report very large Sea Trout spawning next to, south, and north of the Applicant's site.

The streams have a rich invertebrate life, with multiple Caddis fly, Stonefly, Mayfly, water beetle and bug species, crustaceans, abundant Beautiful Demoiselle damselflies, and aquatic molluscs.

2. THREAT TO THE FLOW OF THE ROMANS WINTERBOURNE

The proposal to extract 20,000 litres of water per day at times when it is in flow is wholly unsustainable.

Like most winterbourne chalk streams, the Romans Winterbourne is under threat. With pressures of abstraction on the aquifer, lack of maintenance, and upstream blockages, the Winterbourne cannot be regarded as in good health. I think that large Sea Trout are not seen over perhaps a mile of the most southerly, upstream part of the Winterbourne at present, though they were there as recently as 20 years ago (perhaps much less) and could be so again if positive measures are taken.

The Winterbourne needs increased flow, and increased conservation management activity, not further obligate demands for water extraction upon it. Rising population consistently adds enough pressure on water supply without additional new threats. The Winterbourne needs to be in water for as long as possible over the winter to ensure as broad an opportunity as possible for juvenile Trout to grow sufficiently and vigorously enough to enter the main Bevern Stream before spring cessation of flow.

3. THREAT OF RESIDENTIAL DEVELOPMENT IN THE STREAMS' BUFFER ZONE

The current Application for a temporary dwelling in the riparian environment will cause a fracturing of the integrity of this natural and semi-natural linear feature. There should be no further built development in this linear zone because of its public value as a nature conservation and landscape resource.

We must not allow the private exigencies of Applicants' land ownership to dictate where development should take place. The Application is in the 'WRONG PLACE', as the Chiltington campaigners argue.

4. THREAT OF ENHANCED PUBLIC EXCLUSION

The Applicant's list of necessary biosecurity measures (which remind one of the dreadful necessities of Foot and Mouth Disease prevention, or intensive pig farming, or control of hospital-borne infections) and the security measures they propose to prevent unwanted public access,

represent a move in the opposite direction to that which is needed in this countryside.

Furthermore, these biosecurity measures remind us of the intrinsic risks in such intensive fish farming activity.

With multiple pressures for the exclusion of the public from informal access to the wider countryside (CCTV cameras and high exclusion fences around vineyards, solar arrays, livery paddocks, high value crops, deer farms, free range poultry farms, game bird rearing and release sites, etc) we should look sceptically on all Applications for new usages of open land which impose further 'lock down' on countryside which has multiple public values.

5. THREAT TO 'NATURALNESS' IN THIS LANDSCAPE

This application drastically increases the intensity of usage of this site (with a dwelling house, management buildings, covered and uncovered ponds, security boundaries and other features, new vehicular access and enhanced traffic). The favourable historic relationships between semi-natural elements (hedges, shaws, streams) and farmed elements (tilled, mown, and grazed fields) will be damaged and replaced by a development which will visually be a hybrid of an intensive farm complex and another privileged, landscaped private villa.

That will do harm to the exceptional degree of intact naturalness which the landscape of the Bevern Stream has.

6. THREATS OF PRECEDENT SETTING AND PROLIFERATION

If this application succeeds and the business prospers we will never be able to celebrate its success, because such success will power further proliferation of such businesses in our local river catchments, making further demands on water resources and requiring further new infrastructures and 'lock down' security measures.

Fish farms do not come in 'ones'. They come in large numbers. We do not want to initiate a small local version of the great tragedy of the Scottish lochs and rivers, where natural stocks of wild Salmon and

Sea Trout have crashed as a result (in part) of the effects of fish farming.

7. SUSSEX SEA TROUT: A NEGLECTED CONSERVATION IMPERATIVE

We don't need Sturgeon. We already have our own giant fish - native Sea Trout up to 2.5 ft long and 12lb and more in weight - swimming up the tiny streams of the Bevern and the Romans Winterbourne. The fact that these giants have been making their way up our/their little Wealden Streams for many thousands of years (since the end of the Ice Age, 12,000 BP, and perhaps before) is a matter of great wonder.

Their numbers are now perilously low, and any large failures in the systems that keep the streams suitable for their presence (pollution events, low flows, poaching, etc) could do great damage.

Yet the local conservation needs, or even the existence of this species, are currently unknown to most Sussex people, in part because conservationists fear that greater publicity will bring greater threats of poaching.

By bringing this proposal, therefore, the Applicants have ALREADY done real damage, by forcing conservationists to publicise the presence of these great beasts and one of their locations.

The Sturgeon, too, is a great conservation priority in its surviving home range, but it is here promoted not for its intrinsic worth, but at the expense of an existing conservation priority, for the sake of providing well-off consumers with a new novelty for their jaded palates,

Dave Bangs