

# South Downs National Park Public Inquiry

## Part 2: Boundaries

# **Tide Mills**

*(Section P, Map 29)*

## Proof of Evidence

*by*



January 2004

## **1 Introduction**

- 1.1 The South Downs Campaign (SDC) submits the following proof of evidence for the boundary of the designated South Downs National Park within Section P, Map 29 of the Countryside Agency designated boundary maps.
- 1.2 The SDC is a network of organisations working for the best possible South Downs National Park, representing over 80 national, regional and local groups and organisations<sup>1</sup>.
- 1.3 This proof of evidence is part of a series of submissions to the Public Inquiry by the SDC and should be read in the context of the SDC's written proofs of evidence 'SDC 'In Principle' Support for the South Downs National Park'<sup>2</sup> and 'SDC Boundary Process'<sup>3</sup>.

## **2 Detailed Boundary - Section P, Maps 29: Tide Mills**

### **2.1 Description of the Area and its Boundary**

- 2.1.1 The boundary is described using regularly spaced Ordnance Survey six figure Grid References (GR) to assist with relating the written description of the boundary and coincides with the map in Appendix A<sup>4</sup>.
- 2.1.2 The area proposed for inclusion in the National Park (referred to as Tide Mills by the SDC) includes the ruins of the historic Tide Mills and village, shingle beach and the old course and flood plain of the River Ouse down to the sea. Starting at Grid Reference (GR) TQ 454 001 the SDC is proposing that the boundary should follow the eastern edge of the new business park and access road to the east of Newhaven (yet to be built) up to the A259 at GR TQ 452 018. The proposed boundary would then follow the edge of the A259 around to the designated boundary at GR TQ 456 019 where Tide Mills would link with the designated National Park. The boundary would then run from GR TQ 461 009 south-east along the A259 and then south along an embankment down to the beach at GR TQ 469 999. From here the boundary should follow the bottom of the beach at mean low water mark with an open boundary to the sea to link up with the proposed open boundary along the Heritage Coast.

## **3 Justification for Inclusion in the South Downs National Park**

### **3.1 Countryside Agency's Reasons for Excluding Tide Mills**

- 3.1.1 The Tide Mills area of the lower Ouse valley was included in the original area of search for the boundaries of the South Downs National Park. The Countryside

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<sup>1</sup> SDC Biography – Inquiry Document No: 3275/1/1

<sup>2</sup> SDC 'In Principle' Support for the South Downs National Park – Inquiry Document No: 3275/2/1

<sup>3</sup> SDC Boundary Process – Inquiry Document No: 3275/3/1

<sup>4</sup> Appendix A – Inquiry Document No: 3275/11/2

Agency's Public Consultation Report states: "*The Tide Mills area of Newhaven does not meet the criteria due to influence of industrial development on its eastern side.*"<sup>5</sup>

- 3.1.2 This reasoning was repeated in the Local Authority Consultation Document but was elaborated to read: "*The wetland area is a designated SNCI but it is not of high landscape quality. Its character and quality is influenced by the adjacent industrial areas and docks and the modern part of Bishopstone. It is also cut in half by the railway embankment. Although seen in association with the Downs landscape, its different character and lesser quality do not make it worthy of inclusion.*"<sup>6</sup>
- 3.1.3 Having been made aware of the proposed Ouse Estuary Project (see below) via representations made at earlier stages, the reason for omission provided for the Countryside Agency Board meeting on the 14th November 2002 stated: "*This area forms part of the Ouse Estuary Project which comprises the development of a business part [should read 'park'] and new access road as well as a significant area of reed bed restoration, creation of a Local Nature Reserve and improved footpath and cycle access. Phase one of the project which involves reed bed creation and improved access is due to be completed March 2003. Phase two will involve the construction of an access road and business park. The environmental proposals are likely to make a positive contribution to the area and SSSI designation is expected for the Great Crested Newt population. However the urban context of this site and impact of adjacent development is not likely to change. The area is not regarded as meeting the natural beauty criteria for inclusion. **No change to boundary***".<sup>7</sup>
- 3.1.4 This description of phase two of the Ouse Estuary Project is wrong (see paragraphs 3.2.3 – 3.2.9). However, the Countryside Agency Document *The Boundary and the Reasoning for It*<sup>8</sup> makes only a brief statement about the Countryside Agency's reasons for rejection and does not correct the error above.
- 3.1.5 The SDC regrets the omission of the Tide Mills, the surrounding floodplain, wetlands, reed lands, creeks, and the shingle beach between Newhaven Harbour and Seaford. The SDC considers this area possesses both the necessary tranquility and outstanding natural beauty, providing a visual link between the dip slope of the Downs and the exposed stretch of natural coastline. It is served by a network of public footpaths from Newhaven, Seaford, and the Downs around Bishopstone village. This interesting and accessible area deserves the long-term co-ordinated management of the National Park Authority.

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<sup>5</sup> A South Downs National Park: Public Consultation Report (CA 89) - November 2001, page 60 – Inquiry Document No: CD 031

<sup>6</sup> A South Downs National Park: Consultation with Local Authorities Report (CA 111) - May 2002, page 67 - Inquiry Document No: CD 027

<sup>7</sup> Annex 1, Countryside Agency Board Paper & Minutes: (AP 02/33), November 2002, South Downs National Park Designation Order, page 42, Table 1.2 – Inquiry Document No: CD 038

<sup>8</sup> South Downs National Park: The boundary & the reasoning for it. (CA 133), page 19 – Inquiry Document No: CD 023

### **3.2 Justification Against Criteria – Natural Beauty**

3.2.1 The flood plain, although fairly flat in itself, is important in providing a setting which helps to emphasise the majesty of the Downs behind. The area was the original course of the River Ouse before it was straightened by a ‘cut’ in the 1620s and the port of Newhaven established. Until the recent implementation of Phase One of the Ouse Estuary Project the land was largely managed as arable farmland.

3.2.2 The beach and foreshore at Tide Mills allow spectacularly beautiful and unparalleled views from Seaford Head across to Newhaven Harbour Heights. This area would include the only natural shingle bay in the National Park. Without the water meadows, shingle beach, and the flat river valley foreground, the beauty of the Downs would be diminished. In particular, the views from a wild deserted beach up the Bishopstone valley to the old village with its Saxon church set in the folds of the Downs link the sea to the surrounding hills. Historically, geologically and geomorphologically this area is an integral part of the downland landscape.

#### *The Ouse Estuary Project*

3.2.3 The Ouse Estuary Project is being undertaken by East Sussex County Council (ESCC) with substantial funds from the European Community. The project is the largest environmental project undertaken by the ESCC in the last twenty years and has cost £1 million to date. Phase One of the project was completed recently and further environmental enhancements are envisaged<sup>9</sup>.

3.2.4 So far, Phase One of the project<sup>10</sup> has achieved the following:

- 108 acres of previously arable farmland have been converted into a publicly accessible wildlife area, including 24 acres of new reed beds;
- 7 acres of new scrub planting has taken place which will screen the eastern edge of Newhaven and the A259;
- 5 new ponds have been constructed to help the Great Crested Newt population (at least 4000);
- 17 hibernaculums have been created for the Great Crested Newts;
- 77 acres of grassland are now managed for wildlife;
- a network of new cycleways (part of the National Cycle Network) have been constructed and footpaths enhanced;
- improved public access information and interpretation;
- the estuarine character of the area has been significantly enhanced;
- all of the 108 acres are now in public ownership and the site will become a Local Nature Reserve. It is presently being assessed for SSSI status;

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<sup>9</sup> Appendix B - The Ouse Estuary Project: The Master Plan - November 1997 – Inquiry Document No: 3275/11/2

<sup>10</sup> Appendix C – Map of Phase One of the Ouse Estuary Project – Inquiry Document No: 3275/11/2

- A viewing area for bird watching has been constructed and will be further enhanced.

3.2.5 This has had the effect of:

- providing a visual buffer between the eastern edge of Newhaven and the surrounding countryside;
- reducing the visual impact of the A259 upon the Ouse levels<sup>11</sup>;
- conserving and enhancing the wildlife habitat which is of particular importance to a European protected species (Great Crested Newts);
- creating a major wetland feature reminiscent of an old river course;
- enhancing the opportunity for people to enjoy the area but without conflicting with wildlife;
- conserving and enhancing the remote character of the levels;
- creating opportunities for the public to gain a greater understanding of the natural attributes of the site.

3.2.6 The statement to the Countryside Agency Board gives the impression that Phase One of the Ouse Estuary Project only included some reed bed creation and improved access. From the information provided above one can see that Phase One has created a much more defined landscape flow from the Downs to the sea through the Tide Mills levels as well as providing significant wildlife enhancement and improved public access.

3.2.7 Phase Two<sup>12</sup> lies to the south of Phase One and contains the main public access to the beach and some car parking for that purpose. The design objectives of Phase Two are:

- To conserve and enhance the open landscape gap between the settlements;
- To conserve and enhance the wildlife value of the area;
- To enhance the opportunity for informal public recreation including a review of car parking facilities, cycle routes and access for people with disabilities;
- To conserve and enhance the remote character of the levels and reduce the impact of the A259 upon them;
- To contribute to the buffer between the port, the countryside and urban areas.

3.2.8 Contrary to the statement to the Countryside Agency Board, the Ouse Estuary Project does not include a new business park and access road, though the project is facilitated by their construction and designed around them. Nevertheless it should be recognised that when the access road and business park are constructed they will incorporate considerable extra landscaping works that will further soften the eastern edge of Newhaven.

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<sup>11</sup> See photos 1 & 2, Appendix D – Inquiry Document No: 3275/11/2

<sup>12</sup> Schematic of the Ouse Estuary Project, Appendix E – Inquiry Document No: 3275/11/2

3.2.9 Phase Three would be the main recreation part of Ouse Estuary Project. Its design objectives are:

- To retain and enhance the remote and natural character and quality of the beach;
- To conserve and enhance the wildlife value of the area;
- To retain and enhance the undeveloped coastal skyline;
- To conserve, enhance and interpret the industrial archaeological heritage of the area;
- To enhance the recreational sites and use of the area;
- To serve as a buffer between the Port development, the countryside and the urban areas.

3.2.10 The statement that “... *the urban context of this site and the impact of adjacent development is not likely to change.*”<sup>13</sup> Is clearly inaccurate given the scale of the landscaping. The cross-sections of the site<sup>14</sup> clearly show that the combination of the mounding and screening provided by the Ouse Estuary Project when linked with the mitigation works for the port access road and the business park will have a significant beneficial environmental effect on the impact of the eastside of Newhaven. This will only increase with the passage of time and the consequent growth of the various planting schemes. The mounding alone reaches to 5m above Ordnance Datum and when one considers the height of similar planting schemes such as that on Pargut Bank in the 1970s it is clear that the overall height of this screening will eventually reach 8m<sup>15</sup>. This will have the effect of significantly enhancing a wild and tranquil area of publicly accessible land between Seaford and Newhaven.

### *Wildlife*

3.2.11 Since the implementation of Phase One of the Ouse Estuary Project it has been discovered that this area contains a nationally significant population (at least 4000) of Great Crested Newts. Further survey work undertaken as part of the Project has also revealed populations of water shrews and harvest mice<sup>16</sup>. As yet, the full impact of the wetland creation on the populations of over-wintering birds has yet to be ascertained. Hopefully, new evidence will be available from winter 2003/4 bird counts during the public enquiry.

3.2.12 There is one Site of Nature Conservation Importance (SNCI) in this area called ‘Tide Mills’. It covers the whole of this part of the River Ouse flood plain and is also incorporated within the area of the Ouse Estuary Project. It is clear from searches of the Sussex Biodiversity Records Centre that the whole of the Tide Mills area is particularly rich in wildlife terms. This abundant presence, of both common and rare

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<sup>13</sup> Annex 1, Countryside Agency Board Paper & Minutes: (AP 02/33), November 2002, South Downs National Park Designation Order, page 42, Table 1.2 – Inquiry Document No: CD 038

<sup>14</sup> These will be available at the public inquiry but are too large to include here

<sup>15</sup> See Photo 3, Appendix D – Inquiry Document No: 3275/11/2

<sup>16</sup> Gleaned from a conversation with the Regional Office of English Nature by Paul Millmore on 6/6/03

wild birds, plants, insects, fish, reptiles, and mammals, significantly adds to the natural beauty of the Tide Mills area and enhances the visitor experience.

3.2.13 The data provided in the search of the Sussex Biodiversity Records Centre is the best available information at present<sup>17</sup>. For example, the SDC is not aware that any survey data is available for the moth species in the area simply because no one has ever paid for such a survey to be carried out. The green sheets in Appendix F<sup>18</sup> list the protected species present in the Tide Mills area and from this it can be seen that there are present on site:

- Great Crested Newts
- Slow Worms
- Viviparous Lizards
- Grass Snakes
- Water Shrews
- Common Shrews
- Pygmy Shrews,
- Water Voles

3.2.14 The white sheets at the front of the document (Appendix F<sup>19</sup>) list the rare species including British Red Data Book 3 *Berosus spinosus* (a scavenger water beetle) and British Red Data Book 2 *Lejops Vittata* (a hoverfly) as well as many other Nationally Scarce and Notable species. At the back of Appendix F<sup>20</sup> there is a general description of the Tide Mills SNCI, which gives the non-expert a quick flavour of the wide variety of species which can be found here and further confirms the need to include this area within the National Park.

### *Cultural Heritage*

3.2.15 English Heritage is presently considering the historic remains of the 18<sup>th</sup>/19<sup>th</sup> century Tide Mills as a Scheduled Ancient Monument. This area includes palaeo-channels associated with the original course of the River Ouse prior to the creation of the ‘New Cut’ through Newhaven in 1620<sup>21</sup>. Seaford is still a Cinque Port and the ‘old harbour’ lay somewhere in this area near Bishopstone during the Medieval /Elizabethan periods. As well as ruins of the Tide Mills the area contains remains which include:

- medieval saltworking sites;
- a Great War seaplane station;
- the inter-war Chailey Heritage sea bathing Hospital;

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<sup>17</sup> Appendix F – Sussex Biodiversity Records Centre Search for Tide Mills area – Inquiry Document No: 3275/11/2

<sup>18</sup> Appendix F – Sussex Biodiversity Records Centre Search for Tide Mills area – Inquiry Document No: 3275/11/2

<sup>19</sup> Appendix F – Sussex Biodiversity Records Centre Search for Tide Mills area – Inquiry Document No: 3275/11/2

<sup>20</sup> Appendix F, pages 207-209 – Sussex Biodiversity Records Centre Search for Tide Mills area – Inquiry Document No: 3275/11/2

<sup>21</sup> Appendix G - Pevsner, page 570 – Inquiry Document No: 3275/11/2

- a railway that had an armored train defending Britain during World War I.

3.2.16 Tide Mills was also used as a training area for the Dieppe raid and the D-Day embarkations. More recently, its archaeological importance has been recognised by significant new discoveries which confirm for the first time the existence of medieval ‘saltings’ on this part of the Ouse valley<sup>22</sup>.

### **3.3 Justification Against Criteria – Opportunities For Open-Air Recreation**

3.3.1 The nearby undeveloped downland contains a large number of footpaths and bridleways, while the flood plain itself has a number of footpaths across it including the Vanguard Way (a regional route connecting Croydon to Newhaven). Also, parts of the existing and proposed route of the National Cycle Network cross the Tide Mills area north of the railway line.

3.3.2 Overall, Tide Mills offers a different recreational experience to the chalk Downs, especially as this part of Seaford Bay is one of the most important local bathing beaches. This stranded river estuary is also used for walking, cycling bird watching, fishing, diving and sailboarding. Due to the level nature of the topography Tide Mills is also particularly accessible to the disabled and this overlooked consideration has been further enhanced by the implementation of Phase One of the Ouse Estuary Project. Further improvement works are also envisaged in later stages of the Project and would help meet the social equity requirements of any National Park.

3.3.3 Sustainable access to this proposed part of the National Park can presently be gained from Newhaven and Bishopstone train stations. In addition, Newhaven has a regular, year-round ferry service, important for bringing visitors into the area in a more sustainable manner from abroad. These rail services link to the wider national network.

### **3.4 Additional Considerations**

3.4.1 By bringing the National Park down onto the old flood plain part of the boundary will follow the proposed new urban fringe. This would make perfect sense, with the sea (low water mark) providing the other obvious physical boundary. Nevertheless there is also a sound case for open boundaries to the sea as we propose in the Heritage Coast section. We would suggest that if the inspector accepts this concept then between the Heritage Coast and the eastern edge of Tide Mills the boundary of the National Park should be the mean low water mark, open to the sea.

## **4 Recommendation**

4.1 The SDC considers that this area meets the statutory criteria and the Countryside Agency’s policy and approach for defining National Park boundaries and requests that the Inspector recommends to the Secretary of State that the Tide Mills area should be included within the South Downs National Park.

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<sup>22</sup> Appendix H – Archaeological Survey – Inquiry Document No: 3275/11/2