

South Downs National Park Public Inquiry

Part 2: Boundaries

Sheepcote Valley – Eastern Bank

(Section P, Map 31)

Written Representation

by

Brighton Urban Wildlife Group

on behalf of



November 2003

1 Introduction

- 1.1 The South Downs Campaign (SDC), in association with Brighton Urban Wildlife Group (BUWG), submits the following written representation for the boundary of the designated South Downs National Park within Section P, Map 31 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 organisations¹. BUWG covers the Shoreham to Saltdean conurbation and is committed to improving the quality of life (for people and wildlife). It is the ‘umbrella’ group for the federation of over 30 local community wildlife groups in the area, with 8 of these groups directly connected to the National Park boundary.
- 1.3 This written representation 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’² and ‘SDC Boundary Process’³.

2 Detailed Boundary - Section P, Map 31: Eastern Bank of Sheepcote Valley

2.1 Description of the Area and its Boundary

- 2.1.1 The SDC is proposing that the eastern bank of Sheepcote Valley, which rises above East Brighton Park curving around to the racecourse to the north and westwards to Wilson Avenue, should be included in the South Downs National Park.
- 2.1.2 The SDC’s proposed boundary would follow the break of slope at the foot of the eastern bank, or features such as tracks, fences and the edge of woodland.
- 2.1.3 The boundary proposed by the SDC departs from the designated boundary at Grid Reference (GR) TQ 345 055, following the southern edge of the racecourse (northern edge of the bridleway) west until it meets Wilson’s Avenue close to GR TQ 338 056. It then heads south along Wilson’s Avenue to GR TQ 339 054 where it heads east along a metalled track before following the break of slope around the top of the valley. South of GR TQ 344 050, the proposed boundary follows a combination of break of tracks and fence lines until GR TQ 342 039. South of here the boundary follows the very clear demarcation between the grass of the more formal East Brighton parkland and the wood and scrub above it. The boundary follows the edge of the B2118 east and the bridleway alongside it, following the bridleway as it heads north-east to join up with the designated boundary again. The proposed boundary is shown in the Map in Appendix A⁴.
- 2.1.4 While acknowledging that a boundary in this area is difficult to determine, the SDC considers that using the local topography as a natural boundary is a longstanding, if not permanent, feature to follow. The SDC considers the sharp edge of the steep,

¹ SDC Biography – Inquiry Document No. 3275/1/1

² SDC ‘In Principle’ Support for the South Downs National Park – Inquiry Document No. 3275/2/1

³ SDC Boundary Process – Inquiry Document No. 3275/3/1

⁴ Appendix A – Inquiry Document No: WR 3275/4b

grassed scarp slope as it meets the rough scrub grassland of the valley floor provides an acceptable boundary line. Where it is not possible to use this feature, tracks, fence lines and the well defined edge of woodland/scrub in the lower part of the valley form a suitable boundary.

- 2.1.5 The eastern bank of Sheepcote Valley was included in the draft boundary for public consultation but then excluded so that the boundary could follow a more clearly defined feature on the ground⁵. It is worth noting that the Countryside Agency acknowledged that some of the land west of the designated boundary meets the criteria⁶. The SDC suggests that all the land that the SDC is proposing be included in the National Park falls into this category. This is discussed further in the following sections.

2.2 Justification Against Criteria – Natural Beauty

- 2.2.1 The SDC considers that the whole of the eastern bank of the Sheepcote Valley meets the natural beauty criteria for the following reasons:

- 2.2.1.1 It is a part of an extensive tract of downland landscape, free of incongruous features;
- 2.2.1.2 The northern part of this proposed addition, at the top end of the valley, has been recognised locally through its designation in the Brighton Borough Local Plan as an Area of Important Landscape and Environmental Value⁷;
- 2.2.1.3 It is part of the remnant ancient chalk grassland in the South Downs;
- 2.2.1.4 Its value for flora and fauna has been formally recognised by the Brighton and Hove Council through designation as a Site of Nature Conservation Importance (SNCI) and includes classic downland flora such as Round-headed Rampion;
- 2.2.2 This area is an essential part of the East Brighton Downs, seamlessly part of the rolling downland landscape that extends eastwards to Roedean and Woodingdean, all of which is in the designated National Park. It forms an impressive sweep of downland on the eastern side of Sheepcote Valley.
- 2.2.3 The SDC considers this majestic, steep curving Down is of outstanding natural beauty. It is a dominant landmark. It has a magnetic draw, tempting one to climb, to experience the 360 degree panorama of the wider South Downs: across to the Heritage Coast where the sun rises in the east; round to the north, following the South Downs Way hinterland; west, to the great hilltops of Hollingbury, Cissbury and Chanctonbury; and right round the Sussex Bay to the Isle of Wight and the magnificent sunsets. This area is the focus and essential link in the East Brighton landscape of Whitehawk Hill, Bevendean Down and Woodingdean/ Roedean

⁵ South Downs National Park: Local Authority Consultation (CA 111) page 103 – Inquiry Document No: CD 027

⁶ South Downs National Park: Local Authority Consultation (CA 111) page 69 – Inquiry Document No: CD 027

⁷ Brighton Borough Local Plan Proposals Map – Inquiry Document No: CD 099

downland. This is formally recognised in the Brighton and Hove Local Plan – Second Deposit Draft⁸, which highlights the ‘greenways’ that join this downland into a cohesive whole. The northern end of Sheepcote Valley is at the heart of this confluence and it is here where the spectacular, top-of-the-world, all-round vista is at its most impressive.

- 2.2.4 There is no incongruity in this landscape, no built development within it, not even a mast or pylon. Only further down into the floor of Sheepcote Valley does one see the more formal recreation of the sports pitches and, further over, set against the edge of built-up Brighton, the temporary BMX track, civic amenity site and school. However the SDC does not consider that these distant fixtures detract from the area proposed to be included within the National Park boundary.
- 2.2.5 This publicly owned area is managed in a sympathetic manner as open Down, one of the few remnants of ancient chalk grassland that still survives. This gives the feeling of a big open landscape. It is wholly accessible, free of fence and hedge. It steps out and rises from the urban edge of Brighton to dominate the area with its characteristic downland form. It is one half of the Red Hill plateau hillside that rises to the north.
- 2.2.6 Due to the relict landscape, which has remained free from intensive farming practices, this area is very rich in flora and fauna, recognised by its designation as a SNCI. The profusion of colour and variety on this slope is a wondrous summer sight. Here are the typical, but now sadly scarce flowers of the chalk, including Round-headed Rampion, also known as the Pride of Sussex because it is confined in the UK to this area. Perhaps the showiest is the unusual blue Creeping Bellflower, which is common here. Of note on this slope are the assemblages of the typical herbs of chalk grassland (eg. Thyme and Marjoram), the many hawkweed species, Bee and other orchids, and the vetches that support our downland blue butterflies, like the Adonis, Chalkhill, Common and Small Blue. It is worth noting that there are extremely rare arable weeds here, protected by being outside the commercially farmed Downs. Fumitories, Broad-leaved Spurge, Tuberos Pea and Venus’s Looking-glass are but a few of these old cornfield flowers.
- 2.2.7 The wildlife found here is representative of classic downland. One of the greatest ambassadors for this site is one of the smallest – the Skylark. This little bird nests on the Sheepcote Valley slope and anchors the downland sense of place with the many users of the area. Although we are in the heart of Kipling country, it is really Vaughan Williams that one thinks of, for “*the lark ascending*” from this hillside issues forth the most melodious and evocative of bird-song. Rarer birds, lost in the more intensive agriculture of the wider Downs are found here, in particular the Corn Bunting and Meadow Pipit. This valley is also a major migrational motorway service station. The Wheatear calls in during March for its first landing from the continental mainland. As well as the more typical species, the valley slope regularly attracts exotic rarities, such as the recent Pallas’s and Yellow-browed Warblers. The autumn gives us a second chance to wonder at the terrific journeys of these birds as they stop by in Sheepcote Valley to feed up before their long haul south for the winter.

⁸ Brighton & Hove Local Plan Second Deposit Draft - Inquiry Document No: CD 096

- 2.2.8 The sweeping chalk ridge ‘escarpment’ is like a green wall rising over East Brighton. This Upper Chalk provides the link with the marine world (which the SDC suggests should also be part of the National Park) for this is where it was created. Many a child has returned home with a sea urchin fossil in his or her pocket, continuing a tradition when shepherds treasured these keepsakes for good luck (and referred to as Shepherds Crowns) and, before that, they held important pagan values. There is also Clay-with-Flints here, which adds diversity to the flora and fauna (e.g. Dartford Warblers in the gorse bushes). Brighton and Hove City Council has also been working with the local community, putting back one of the dew ponds which would have been a feature of these clay plateaux. The locally significant Sarcen stone can also be found here.
- 2.2.9 Gazing across to the summit of Whitehawk Hill one can make out the remains of the 5000 year-old Neolithic camp – this whole area is part of the south-east’s cradle of civilisation. When one is walking on the Sheepcote downland one is in the company of the ghosts of past generations; for here, as well as the Council’s newly designated Local Plan Greenways, are the ancient trackways.

2.3 Justification Against Criteria – Opportunities For Open-Air Recreation

- 2.3.1 The SDC considers that the eastern bank of the Sheepcote Valley meets the criteria of opportunities for open-air recreation for the following reasons:
- 2.3.1.1 The area is open access land;
- 2.3.1.2 The Friends of Sheepcote Valley, guided walks and information boards all contribute to provision of understanding and enjoyment of this part of the South Downs, a service which could be expanded and enhanced by the National Park Authority;
- 2.3.1.3 The area is gateway for local people and visitors alike to the National Park within walking distance from East Brighton and with good public transport links from the surrounding urban areas; and
- 2.3.1.4 Immediately adjacent to the SDC’s proposed boundary is a campsite which services visitors to the South Downs.
- 2.3.2 This area is all open access land and because of its natural beauty and accessibility, is extremely popular. Stepping out the front door, here directly in front of you is an open, extensive tract of downland that rolls out across the landscape beckoning you to explore. Whether to head high and go for the views, or strike out in search of those hidden valleys, is always a wonderful dilemma. For others, a short circuit, choosing from a wide variety of routes, is a healthy tonic to the stress and sickness symptomatic of urban living. Sheepcote Valley provides this important gateway.
- 2.3.3 Just being in touch with nature and the downland landscape is sufficient for many to gain the sense of spiritual renewal. The chalk grassland is fully accessible, so people can really appreciate the diversity of the flora. For children, this place is special. With so much freedom taken away in this modern pressurised world, Sheepcote Valley is such an important place for making dens, climbing trees, being secret agents,

exploring fantasy worlds. This is a safe place, away from dangerous roadways, but with all the facilities that could never be designed in a formal urban park. Overtly or subliminally, children are in touch with their local Downs, with the nature that pervades, the history and culture that is so deeply rooted.

- 2.3.4 Walking is the number one recreational activity, but family outings, exercising the dog or its owner, keeping fit, kite-flying or just enjoying the view are all popular past-times in the area. One regularly sees the race-horses training in the early mornings on top of the hill, or casual horse-riders utilising the bridleways running through the area, as do the many cyclists. The constant buzz of activity is something very heart-warming in this popular part of Downs, whether it is passing the time with a fellow traveller, or watching the cricket or football in the valley bottom. This is a lively, dynamic, warm and friendly landscape.
- 2.3.5 The catchment area for Sheepcote Valley is significant for local people and visitors alike. Several thousands of people can stroll out from their houses and reach it in seconds or a few minutes. ‘Access for all’ is easy, whether via the southern gateway of East Brighton Park, or through multi-access points along Wilson Avenue, or via Warren Road. To the west are Kemp Town and Whitehawk, to the south and east lie Roedean and Rottingdean, with Woodingdean to the north-east. The area has extensive public transport links to provide for visitors to the area, including links with the train into Brighton. Whitehawk and Woodingdean are exceedingly well served by buses, and there are regular services that run along the A259 coast road. Although Woodingdean has immediate access to the more extensive Downs of Castle Hill and Balsdean, this is restricted to the public rights of way and permit-access National Nature Reserve. Here at Sheepcote Valley is unencumbered freedom to roam. To be in the National Park embraces twenty-first century ideals of sustainable access; having Whitehawk’s downland within the boundary adds social inclusion as a powerful weight to the compelling justification.
- 2.3.6 The evidence for the popularity of this area is shown by the number of people, who regularly use it for their quiet, informal recreation pursuits. People love this place, and a telling anecdote is the hundreds of people, from children and pensioners, to councillors and MPs, who turned up to demonstrate against a proposed sewage works in the Valley.
- 2.3.7 Sheepcote Valley houses the first municipal campsite to have been set up in the country and it is still one of the few campsites that exists to service the popular South Downs. As such, it is an invaluable asset for the National Park, immediately adjacent to the SDC’s boundary, with its philosophy on open-air recreation, sustainable access and social equity. It is less than three miles from the South Downs Way National Trail and is an ideal setting-off point for access to the eastern Downs, the Lewes Downs to the north-east, or scarp face (Ditchling Beacon and Devil’s Dyke) and Weald to the north.

2.4 Additional Considerations

- 2.4.1 Given that the Countryside Agency accept that much, if not all, of the area proposed for inclusion meets the criteria⁹, the SDC considers that there is no reason to exclude this landscape. While acknowledging that the proposed boundary does follow a variety of features, they are, for the most part, very clear and easily identifiable lines on the ground. Even if it is considered that the SDC's proposed boundary is not the clearest line on the ground in places, the Countryside Agency have stated that this is no reason to exclude an area which clearly meets the criteria. This was stated in the Countryside Agency's response to objectors' comments about land being included at Village Way North in Brighton¹⁰.
- 2.4.2 The racetrack and gallops add to the recreational experience and set an historic context, for horse-racing has been going on here since Victorian times. It highlights a vital aspect of the local economy – income from recreation and tourism; this tends to be missed when one is immersed in the more agriculturally dominated Downs. The Foot and Mouth Disease crisis brought this point home and showed the value of our downland economy as a recreational asset. It also demonstrated the value of Sheepcote Valley, for here was a place where access had not been banned. Many more people came to use this area as a result.
- 2.4.3 Formal sports visitors to East Brighton Park play under the impressive wall of the Valley ridge – setting the downland sense of place in their minds. Games are played in summer and winter, most popularly cricket and football respectively. With the changing colours of the leaves of the trees and shrubs, the downland flora's spring whites and yellows to the autumn blues and purples, the area provides real contact and awareness of the seasons.
- 2.4.4 There are local shops to the north in Warren Road and west in the Whitehawk boulevard and in East Brighton Park is the refreshment pavilion, which provides a useful facility and focal point for Sheepcote Valley users, adding emphasis to its gateway role.

3 Recommendation

- 3.1 This area clearly meets the Countryside Agency's criteria and approach for defining National Park boundaries. The SDC strongly urges the Inspector to recommend to the Secretary of State that the boundary be amended to include Sheepcote Valley's eastern bank in the South Downs National Park.

⁹ South Downs National Park: Local Authority Consultation (CA 111) page 69 – Inquiry Document No: CD 027

¹⁰ Position Paper 2 - The South Downs National Park Boundary, Countryside Agency, July 2003, Annex 4, page 8, no.16 – Inquiry Document No: CD 070