

LW/26/0191 – Mr James Smith

To: Lewes District Council

From: East Chiltington Parish Council

Re: EIA Scoping Report – North Barnes “Small Market Town” (c.3,000–3,250 dwellings)

Date: April 2026

Response to the EIA Scoping Report by Rownsmoss Wessex Ltd / Stantec (North Barnes Farm)

1. Introduction

East Chiltington Parish Council (ECPC) welcomes the opportunity to comment on the Environmental Impact Assessment (EIA) Scoping Report submitted to Lewes District Council (LDC) in relation to the proposed development of a new settlement at North Barnes Farm, East Chiltington, to the east of Plumpton Green.

The Parish Council emphasises that this is a proposal of exceptional scale and sensitivity, comprising up to 3,250 dwellings across approximately 184 hectares of predominantly undeveloped agricultural land within East Chiltington Parish. The site lies immediately adjacent to the South Downs National Park and contains environmentally sensitive features of regional and national importance.

ECPC objects to any methodology that seeks to minimise significance by comparing the development to national or regional housing totals. The "significance of effect" must be weighed against the specific local baseline of East Chiltington, Plumpton Green, and Cooksbridge. An impact that is minor in a national context may be highly significant in the context of a small rural parish.

ECPC notes the applicant's stated intention to submit a full planning application by December 2026 rather than to promote the site for an allocation through a revised local plan for Lewes district and to respect the outcome of that process. Development of this scale and complexity should be properly assessed alongside other strategic decisions which are the proper function of the development plan.

In due course we would expect LDC to maintain a 'prematurity' based reason for refusal of this planning application, but we recognise that there is no bar to an application being submitted on a speculative basis.

This response therefore focuses on the appropriateness of the proposed EIA methodology and scope, informed by the specific environmental, hydrological, landscape, and infrastructure constraints of the site. We assume that the applicant has been studying and monitoring site conditions, landscape and ecological baseline conditions for some time and will provide evidence accordingly, since they clearly cannot obtain the full information required to support the EIA between now and the end of the year.

A summary of suggested requirements is provided at the end of this document.

2. Statutory Context: Regulation 15 and 18(4)

Under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations"), LDC is required to state the information that must be provided in the Environmental Statement (ES). The PC highlights that under Regulation 18(4), the eventual ES must be "based on the most recent scoping opinion" issued by the Council.

This is a critical procedural safeguard. By setting an uncompromising scope now, LDC ensures that the applicant cannot "short-cut" critical surveys or omit difficult technical modelling in their rush to meet a speculative deadline. The ECPC urges LDC to adopt the requirements set out in this representation to ensure the EIA and resulting ES provides a sound basis for decision-making.

3. Environmental Context

ECPC considers that the baseline environmental conditions of the site are not fully reflected in the proposed scope of the ES, leading to the possibility of underestimating the likely significant effects. LDC should respond accordingly.

3.1 Landscape and Visual Sensitivity

The application site is situated in the immediate setting of the South Downs National Park. As approximately 55% of Lewes District is located within the national park, the remaining "host" land in the Low Weald serves as a critical buffer between the Park and large built up areas. The South Downs National Park Authority (SDNPA) has a statutory duty to conserve and enhance the natural beauty and setting of the Park.

The proposed location is a strategic intervention in open countryside which currently represents:

- A transition from open rural landscape to nationally protected landscape
- A location where development would result in permanent urbanisation of panoramic views, for example from Ditchling Beacon and Blackcap.

ECPC suggests that the LDC Scoping Opinion draws attention to and requires assessment of scale and significance that 188-hectare rural site represents in the setting of the SDNP. The irreversible change in the landscape (both character and visual) is an environmental impact that requires assessment, not simply localised effects.

Implications for EIA/ES: The methodology must include:

- Long-distance Zone of Theoretical Visibility (ZTV) analysis extending deep into the National Park
- Winter-only photography and visualisations, to avoid reliance on seasonal screening
- Assessment of night-time visual impacts, given dark sky sensitivity.

Hydrology, soils, and the Bevern Stream

The site is underlain by heavy Weald clay, which is effectively impermeable and prone to rapid surface runoff. Critically, the Bevern Stream—a rare chalk-stream habitat—runs directly through the site and supports sensitive species including the European eel, water vole, upwinged mayfly, and the Sussex Tiger Sea Trout, for which the Bevern is one of its very few remaining spawning grounds

Because of the specific hydrology and clay soils, conventional Sustainable Drainage Systems (SuDS) are unlikely to function effectively in a development of this scale. Development at this scale would also generate high-velocity runoff, increasing risks of:

- Channel erosion (“scouring”)
- Sedimentation of spawning gravels
- Pollution from urban runoff.

Implications for EIA/ES: The proposed methodology is currently inadequate. It must:

- Have specific regard to any relevant aims and objectives of the Local Nature Recovery Strategy
- Explicitly model “saturated clay” hydrological conditions
- Apply at least a 40% climate change allowance
- Include detailed water quality modelling
- Treat the Bevern Stream as a highly sensitive receptor of more than local importance

3.3 Dark skies and lighting

The site lies within the setting of the South Downs International Dark Sky Reserve. A development of this scale would inevitably generate significant sky glow and light spill, fundamentally altering the rural night environment.

Implications for EIA/ES: We note that the applicant suggests that lighting can be scoped out as a specific requirement because the impact on ecology and landscape will be assessed within those headings. We strongly disagree with that view, and we urge LDC to respond that scoping out of lighting is incorrect. The potential impact of 'urban' levels of lighting, both from specific sources and residential occupation could have a significant impact on the environment. The EIA must include as a separate chapter:

- Baseline dark sky measurements
- Assessment of sky glow over the National Park
- Impacts on nocturnal ecology
- The overall effect of urban lighting in a previously unlit area

3.4 Infrastructure constraints and Transport

Development at this scale will have a major impact on local road networks and, potentially, parts of the strategic road network. Background issues relating to the potential environmental effects of that additional traffic include:

- Access roads (e.g. Novington Lane, Highbridge Lane and Chiltonton Lane) are narrow lanes, in many places single-track, which reflects the rural nature of the area. These lanes are used by walkers, cyclists and horse riders with no availability to avoid traffic.
- An amount (which will need to be quantified by the applicant) of traffic movements from the development would enter the national park. It is well established that such movements can have an adverse impact on the statutory objectives of the SDNPA and
- A 12'9" height restriction at the Novington Lane railway bridge constrains HGV access
- the wider transport network includes critical choke points, including level crossings and constrained junctions
- Given the existing network-wide track capacity constraints on the East Coastway line, there is a low probability of National Rail/Network Rail increasing services to the level required at Plumpton Station. In addition, its platforms are sub-standard in length and cannot be extended to accommodate the 8-car or 12-car formations required for high-density commuting without multi-million-pound engineering works that lack a viable funding mechanism
- North Barnes Lane is not an adopted public highway; it currently exists as a privately-owned narrow track and bridleway.

In addition, local evidence demonstrates that:

- Only ~10.6% of trips (in the wider Lewes area) are internalised, meaning ~90% of trips leave the area
- There is very limited local employment, making the proposal inherently car-dependent.

Implications for EIA/ES:

- The transport related elements of the EIA must include consideration of the impact of additional vehicle movements along narrow corridors in particular the one-mile stretch of Novington Lane to the south of the site. Given the lack of formal passing places over a one-mile distance, even a low volume of traffic (approx. 2-5 vehicles) entering the link simultaneously from opposite ends would need to be mitigated. The EIA must also recognise the "human factor" and safety risks associated with requiring multiple vehicles to perform long-distance reversing manoeuvres on a narrow, non-linear rural lane with poor sightlines.

- The ES cannot simply assume "free-flow" conditions; they must prove how a mile-long single-track artery can handle the thousands of daily trips generated by 3,250 homes without causing permanent blockages
- The EIA/ES must consider the impact of an acceptable rerouting strategy for all oversized vehicles and assess the secondary environmental impacts—including vibration, noise, and air quality degradation—of thousands of HGVs navigating the surrounding narrow rural lanes as a result of this diversion
- It will be vital to consider in the assessment the legal rights of way associated with North Barnes Lane and provide a detailed assessment of the structural feasibility of upgrading a private, low-bearing track to serve as a primary artery for a strategic settlement of 3,250 homes.
- It must address capacity considerations at Plumpton Station
- Critically, the "Study Area" must not be restricted to the site boundaries. It must include all areas that will be affected by the new settlement and model impacts on strategic and constrained nodes, including, but not limited to:
 - The impact of additional traffic using that part of the highway network which is within the South Downs National Park on its character and value
 - **the A275 / Cooksbridge Level Crossing:** This is the primary artery to the site. The crossing is closed for approximately 20 minutes every hour in peak hour periods. The methodology must model the cumulative "gate downtime" effect of an additional 3,000+ homes on this single, fragile corridor.
 - **the Lewes Prison Crossroads:** This is the primary entry bottleneck for traffic moving into the historic centre of Lewes.
 - **the B2116 / B2112 junction at Ditchling.** This historic village centre has "extremely limited" mitigation potential. The EIA/ES must model the impact of NBF traffic filtering through Ditchling to access the M23/A23.
 - **Plumpton Green and Station Road:** Station Road is frequently reduced to single-file movement due to permitted on-street parking. The ES must address how this bottleneck will handle the increased load, particularly during level crossing closures.

3.5 Socio-economic considerations

The socio-economic impact of a new development of this scale in previously isolated countryside will be highly significant. The Scoping Report focuses on temporary construction jobs but should also address the environment impact of the need for permanent residents to obtain and access employment. Existing GP surgeries in Plumpton and Lewes are already over-subscribed. Consultations with the practices and with the Integrated Care Board are therefore essential. There is no current secondary school capacity in the local area.

Implications for EIA/ES

- The EIA/ES must incorporate a Permanent Employment Strategy. The developer must demonstrate the impact of additional workforce search, and movements of more than 3,000 households who will find it difficult to find local work in an area with an almost non-existent current job base
- It must assess the impact and requirements for mitigation of approximately 7,000 additional patients
- The ES should assess and demonstrate a technical solution for how children will be educated and the environmental implications of the proposed mitigation including school travel and impact on family life.

3.6 Climate change and sustainability

The EIA/ES must provide a Whole Life Carbon Assessment. This must account for:

- The "embedded carbon" in the construction of a new town.
- The "transport carbon" resulting from what is likely to be an exceptionally high out-commuting rate.

- The loss of the carbon-sink currently provided by 188 hectares of agricultural soil.

3.7 Water and utilities

The baseline for assessment must reflect the current environmental reality and the significance of water stress as a potential constraint, as well as any consequential impacts of providing potable water in particular to a development of this scale. The ES must reflect the acute water scarcity and wastewater capacity deficits present in 2026.

Implications for EIA: Given regional pressures, including recent drought conditions, the EIA must:

- Include a Wastewater Impact Assessment
- Assess the potential for the supply of potable water and consequential issues arising of not doing so
- Include an assessment of water resource sustainability.

3.8 Cumulative Development Context

EIA regulations require the assessment of the cumulative effects of a proposal when combined with others which have already been approved or may reasonably be approved, so as to properly assess specific environmental effects. We note that the applicant proposes to do this on a 'subject by subject' basis. However, we are concerned that a focus on individual issues may mean that the 'in the round' impact of development of a new village/small town at this location in combination with other development to be proposed within the local plan may not be considered. That would clearly be unacceptable.

Implications for EIA/ES

- The assessment must cover all committed and emerging Local Plan allocations; as well as active construction, in order to assess in-combination impacts on transport, water, infrastructure and landscape. It must avoid reliance on a narrow or outdated development list. Key sites include:
- Cooksbridge (Hamsey) Draft Allocations. The 751 additional homes proposed in the February 2026 Draft Local Plan for the Hamsey/Cooksbridge area (Policies CB1: 151 homes and CB2: 600 homes). These homes funnel directly onto the same A275 corridor and level crossing as NBF
- Haywards Heath Strategic Growth. The c.1,450 homes identified in the Mid Sussex strategic pipeline, which will load significant traffic onto the B2112 and the A275/A272 junctions
- Active Construction. The baseline must be updated to include all houses currently under construction in Plumpton and Wivelsfield. These are not "potential" homes; they are a reality that will be fully occupied before NBF even breaks ground, permanently altering the local road and rail baseline

4. Scope of the Proposed EIA – Specific Deficiencies

In light of the above, the ECPC urges LDC to require that following matters are not scoped out:

- Land and soils – inappropriate given the scale of agricultural land loss and clay constraints
- Human health – particularly given air quality, noise, and car dependency
- Lighting – critical given the potential impact on dark skies and the SDNP

5. Methodological Concerns

5.1 Alternatives assessment

Under Schedule 4 of the EIA Regulations, the Applicant is legally required to provide an overview of the reasonable alternatives considered. In view of the speculative approach outside of the local plan process, we

believe LDC should require the ES to explain and justify their decision to proceed in this way in environmental terms. That should include site selection (ownership not being a justification in itself) and the impact on the local plan process were the application to be approved.

5.2 Development parameters and flexibility

The use of a “reasonable worst case” approach is not supported by clearly defined parameters.

Given the scale of development, the EIA/ES must include:

- Parameter plans and maximum development envelopes
- Clear assumptions for traffic, building heights, and phasing

5.3 Phasing and construction effects

The development will take place over a prolonged period, likely more than a decade.

Implications for EIA/ES: The methodology must therefore assess:

- Construction impacts in each phase
- Effects of incomplete infrastructure
- Long-term disruption from sustained construction activity.

6. Conclusion

ECPC considers that the applicant’s approach to the EIA process is designed to create a "path of least resistance" for a speculative project. We urge LDC to issue a Scoping Opinion that reflects the exceptional environmental sensitivity of this site. This means requiring:

- technical rigour and detail especially in regard to matters such as hydrology and ecology
- the reinstatement of scoped-out topics, particularly lighting and human health
- realistic transport modelling based on accurate trip internalisation analysis
- fully detailed surveys at the time of submission in relation to ecological, landscape and biodiversity considerations
- detailed utilities and water resource evaluation
- robust assessment of cumulative impact and alternatives

Without these revisions, the EIA will not provide a sound or reliable basis for decision-making on a development of this magnitude and sensitivity.

Appendix 1: Summary of recommended requirements of EIA/ES

Area of impact analysis	Requirement of EIA/ES methodology and scope
Landscape and visual sensitivity	Long-distance Zone of Theoretical Visibility (ZTV) analysis extending deep into the National Park Winter-only photography and visualisations,

	<p>to avoid reliance on seasonal screening</p> <p>Assessment of night-time visual impacts, given dark sky sensitivity.</p>
<p>Hydrology, soils, and the Bevern Stream</p>	<p>Have specific regard to any relevant aims and objectives of the Local Nature Recovery Strategy</p> <p>Explicitly model “saturated clay” hydrological conditions</p> <p>Apply at least a 40% climate change allowance</p> <p>Include detailed water quality modelling</p> <p>Treat the Bevern Stream as a highly sensitive receptor of more than local importance</p>
<p>Dark skies and lighting</p>	<p>The EIA must include as a separate chapter:</p> <p>Baseline dark sky measurements</p> <p>Assessment of sky glow over the National Park</p> <p>Impacts on nocturnal ecology</p> <p>The overall effect of urban lighting in a previously unlit area</p>
<p>Infrastructure constraints and transport</p>	<p>The transport related elements of the EIA must include consideration of the impact of additional vehicle movements along narrow corridors in particular the one-mile stretch of Novington Lane to the south of the site. Given the lack of formal passing places over a one-mile distance, even a low volume of traffic (approx. 2-5 vehicles) entering the link simultaneously from opposite ends would need to be mitigated. The EIA must also recognise the "human factor" and safety risks associated with requiring multiple vehicles to perform long-distance reversing manoeuvres on a narrow, non-linear rural lane with poor sightlines.</p> <p>The ES cannot simply assume "free-flow" conditions; they must prove how a mile-long single-track artery can handle the thousands of daily trips generated by 3,250 homes without causing permanent blockages</p> <p>The EIA/ES must consider the impact of an acceptable rerouting strategy for all oversized</p>

	<p>vehicles and assess the secondary environmental impacts—including vibration, noise, and air quality degradation—of thousands of HGVs navigating the surrounding narrow rural lanes as a result of this diversion</p> <p>It will be vital to consider in the assessment the legal rights of way associated with North Barnes Lane and provide a detailed assessment of the structural feasibility of upgrading a private, low-bearing track to serve as a primary artery for a strategic settlement of 3,250 homes.</p> <p>It must address capacity considerations at Plumpton Station</p> <p>Critically, the "Study Area" <u>must not</u> be restricted to the site boundaries. It must include all areas that will be affected by the new settlement and model impacts on strategic and constrained nodes, including, but not limited to:</p> <p>The impact of additional traffic using that part of the highway network which is within the South Downs National Park on its character and value</p> <p>the A275 / Cooksbridge Level Crossing: This is the primary artery to the site. The crossing is closed for approximately 20 minutes every hour in peak hour periods. The methodology must model the cumulative "gate downtime" effect of an additional 3,000+ homes on this single, fragile corridor.</p> <p>the Lewes Prison Crossroads: This is the primary entry bottleneck for traffic moving into the historic centre of Lewes.</p> <p>the B2116 / B2112 junction at Ditchling. This historic village centre has "extremely limited" mitigation potential. The EIA/ES must model the impact of NBF traffic filtering through Ditchling to access the M23/A23.</p> <p>Plumpton Green and Station Road: Station Road is frequently reduced to single-file movement due to permitted on-street parking. The ES must address how this bottleneck will handle the increased load, particularly during level crossing closures.</p>
<p>Socio-economic considerations</p>	<p>The EIA/ES must incorporate a Permanent Employment Strategy. The developer must demonstrate the impact of additional</p>

	<p>workforce search, and movements of more than 3,000 households who will find it difficult to local work in an area with an almost non-existent current job base</p> <p>It must assess the impact and requirements for mitigation of approximately 7,000 additional patients</p> <p>The ES should assess and demonstrate a technical solution for how children will be educated and the environmental implications of the proposed mitigation including school travel and impact on family life.</p>
<p>Climate change and sustainability</p>	<p>The EIA must assess:</p> <p>The "embedded carbon" in the construction of a new town</p> <p>The "transport carbon" resulting from what is likely to be an exceptionally high out-commuting rate</p> <p>The loss of the carbon-sink currently provided by 188 hectares of agricultural soil</p>
<p>Water and utilities</p>	<p>The EIA/ES must include:</p> <p>A wastewater impact assessment</p> <p>A potable water supply strategy</p> <p>Assessment of water resource sustainability</p>
<p>Cumulative development context</p>	<p>The assessment must cover all committed and emerging Local Plan allocations; as well as active construction, in order to assess in-combination impacts on transport, water, infrastructure and landscape. It must avoid reliance on a narrow or outdated development list. Key sites include:</p> <p>Cooksbridge (Hamsey) Draft Allocations. The 751 additional homes proposed in the February 2026 Draft Local Plan for the Hamsey/Cooksbridge area (Policies CB1: 151 homes and CB2: 600 homes). These homes funnel directly onto the same A275 corridor and level crossing as NBF.</p> <p>Haywards Heath Strategic Growth. The c.1,450 homes identified in the Mid Sussex strategic pipeline, which will load significant traffic onto the B2112 and the A275/A272 junctions.</p>

	<p>Active Construction. The baseline must be updated to include all houses currently under construction in Plumpton and Wivelsfield. These are not "potential" homes; they are a reality that will be fully occupied before NBF even breaks ground, permanently altering the local road and rail baseline.</p>
<p>Alternatives assessment</p>	<p>In view of the speculative approach outside of the local plan process, we believe LDC should require the ES to explain and justify their decision to proceed in this way in environmental terms. That should include site selection (ownership not being a justification in itself) and the impact on the local plan process were the application to be approved</p>
<p>Development parameters and flexibility</p>	<p>The EIA/ES must include:</p> <p>Parameter plans and maximum development envelopes</p> <p>Clear assumptions for traffic, building heights, and phasing</p>
<p>Phasing and construction effects</p>	<p>The methodology must assess:</p> <p>Construction impacts in each phase</p> <p>Effects of incomplete infrastructure</p> <p>Long-term disruption from sustained construction activity.</p>