

**Comments upon the Eastbourne Borough Council
Black Robin Farm
Environmental Impact Assessment (EIA) Screening Report
June 2023**

Numbers refer to page and paragraph numbers. Quotes from the report are given within quotation marks and italicised. Some notes may appear quite broad in their context but it is important that the scheme is considered holistically and not as an isolated island.

P9. 2.3.5

“The Proposed Development is not anticipated to have significant urbanising effects as it will replace the current uses on-Site.”

This overlooks the obvious fact that the site was until recently used as a farm base with house, barns and a few holiday cottages that saw unintrusive low level daily farm activity such as a few tractor and lorry movements on and off site along with livestock movements. The proposal changes it into a commercial visitor attraction which, according to figures given at a presentation on 28th February at The Towner, requires around 100,000 visitors per annum to be financially viable. Moving that number of people, however it is done, will create noise and particulate pollution on and off site. The Towner presentation noted that public transport providers had been approached but were currently unwilling to invest in services that might help reduce private car use.

P10. 3.1.2

“The Site is primarily bound by agricultural greenfield space to the north, south and west, with Beachy Head Road and the B2103 (Warren Hill) to the east.”

The characterisation of Warren Hill, and land above Foyle Way at the end of Eastbourne seafront, is omitted. This land to the east is also “agricultural greenfield” space as well as being designated Open Access Land, England Coast Path Coastal Margin and a Site of Special Scientific Interest. The SSSI is mentioned in paragraph 3.2.2.

P11. 3.3.1

“Erection of a refectory building in place of the covered yard building;”

The term “refectory” implies a facility for those working at the site or perhaps, for example, a group on an organised visit. In fact, both from the Towner presentation and associated feedback form, the facility is in significant measure a “coffee shop” designed to attract all and sundry and likely to add to levels of traffic and associated issues.

P12. 3.3.2

“A new Public Right of Way (PRoW) footpath route running along the northern boundary of the Site is proposed, to connect to the existing PRoW that is approximately 600 m to the west. This will link the Site to the wider PRoW network.”

This appears to be joining Beachy Head Road at the Black Robin Farm entrance with Public Bridleway 48e at East Hale Bottom. The reason for this isn't given but at the Towner presentation of 28th February it was explained that people would be encouraged to park at Birling Gap or thereabouts, thus “exporting” Eastbourne’s pollution and traffic congestion, and then use walking routes from Birling Gap. If this remains the explanation then the likely routes being promoted from Birling Gap are across areas that currently suffer less disturbance than many areas, especially when compared to the cliff top sections or scarp summit above Eastbourne town. The increased use of Rights of Way 48, 52, 88, 64, and 49 will pose a further threat to sensitive wildlife enroute. Evidence is available showing these routes are relatively quiet and often little used. Ground nesting birds have already largely disappeared from nearer the cliff tops owing to noise, trampling and, most likely in particular, disturbance from dogs. Skylarks are amongst the ground-nesters to have suffered particularly badly (only three nesting pairs recorded in the Belle Tout bird territory survey 2015) but disturbance will also threaten the ability for some of the larger birds of prey to hunt and nest. Several of these are only now beginning to return to the area after decades of persecution and both they and their prey (some need undisturbed basking areas) demand low levels of disturbance. This commentator has evidence that in recent years buzzards have nested in woodland adjacent to footpath 48.

P12. 3.3.3

“A total of 47 visitor car parking spaces, including 5 family spaces and 5 blue badge bays and 16 staff car parking spaces, including 4 blue badge bays, will be provided.”

There may be just 47 car parking spaces on-site but this overlooks any additional parking near Birling Gap (mentioned above) and the proposal to use the grass carpark at Warren Hill (mentioned at the Towner presentation.) Thus car parking in reality could total several hundred spread around the countryside. The proposed car park at Warren Hill is currently un-surfaced and only used for occasional events. Will it have to be surfaced to cope with increased use? Has any consideration been given to how to deal with increased pollutants and soil erosion caused by more regular use?

From the same paragraph’s next bullet point it suggests taxi services would be used to transport staff when parking spaces are all taken but many would judge this an inappropriate use of public money and an indication that the parking situation is little understood.

P12. 3.3.3

“Coaches will drop-off passengers at the designated turning area at the western end of the Site and then travel to the designated coach park at Beachy Head Visitor Centre (located approximately 1.5 km to the south of the Site) to wait before picking-up passengers in the same way.”

This will likely create both an expanding unsightly blot on the aesthetically important landscape of Beachy Head and could require the expansion in number of the current few bays designated for coach parking. The current coach park can be at capacity in the summer and at certain times of day and if capacity issues bar touring coaches it will force them to park illegally or elsewhere where they will impact on the scenery, peace and quiet thousands come to see and enjoy.

P14. 4.2.2

“The Site falls within the statutory designated area of the South Downs National Park and the Seaford to Beachy Head Site of SSSI (designated for aggregations of non-breeding birds, assemblages of breeding birds, important invertebrate populations, isolated bird colony (Kittiwake) and lowland calcareous grassland) is situated less than 50 m to the east of the Site.”

It would seem an unfortunate precursor to the Borough Council committing to responsibility for an additional environmentally sensitive scheme when management of the existing SSSI land under their ownership is currently (September 2022) given a condition status of “Unfavourable-Declining” by Natural England.

P15. 4.2.9

“For the operational phase, there is the potential for road traffic exhaust emissions associated with vehicles travelling to and from the Site to cause air quality impacts.”

Nowhere in 4.2.9 is there mention of the fact that research elsewhere has concluded that just under half of the pollution caused by road traffic is particulate matter from brakes and tyres and not from exhaust emissions. Visitors to the proposed new facility do not appear to fit the profile of visitors outlined in the South Downs National Park’s report “Special Qualities of the Sussex Heritage Coast” (October 2018). In that thorough investigation within the “Findings” on pages 8 to 15 there appears no demand for art galleries or new cafes but instead a vast predominance of people visiting to enjoy the open space and the views. It would seem likely that to be viable the facility would have to attract a considerable amount of extra traffic containing a new audience thus adding to particulate pollution (exhaust, tyres and brakes), noise and congestion impacting on the enjoyment of the aforementioned report’s visitors. Existing vehicle numbers might be available from data collected by the police Automatic Number Plate Recognition cameras situated at both east and west ends of the Beachy Head Road. They will no doubt be astonishingly high for what is a rural road adjacent to, and likely already having a negative impact on, the SSSI.

P26. 4.4.1

“In February 2022, a Preliminary Ecological Appraisal (PEA) was undertaken to assess the ecology of the Site. The PEA comprised a Phase 1 habitat survey, protected species assessment and ecological evaluation of land on-Site.”

The Preliminary Ecological Appraisal (PEA) links to the forthcoming requirements for Biodiversity Net Gain. In the Natural England Joint Publication JP039, Biodiversity Metric 3.1, Auditing and accounting for biodiversity, User Guide (First published 21st April 2022), page 22 paragraph 3.10 states “the optimal survey season is April to September”. This flaw is in part acknowledged in the PEA page 55 where there is a surprisingly short list of just 37 plant species recorded within the development boundary. No doubt a survey of the flora during the recommended season would produce a more substantial and meaningful result along with a fuller account of the fauna present. The PEA’s concentration on land within the development boundary takes no account of the possible impact the new facility might have on the more distant areas its attendees are being encouraged to walk or cycle across to get there. In particular the increased use of the public footpath and bridleway network should be of concern as already mentioned in the notes referring to P12. 3.3.2 above. Should the negative impact on these more distant areas be sufficient then a Biodiversity Net Gain of 10% on-site would be negated by possible loss of important floral and faunal species in out-of-site out-of-mind areas.

P28. 4.4.14

“On the basis of the above, it is therefore expected that there would be no significant effects on ecology as a result of the Proposed Development.”

This repeats the mistake highlighted above of not considering the wider geographical impacts of additional road traffic and its associated pollutants, noise from traffic and people, lighting from traffic and on-site, increased footfall/trampling and disturbance to currently quiet areas of the Downs mainly to the west beyond the development boundary.

P33. 4.8.7

“Potential landscape effects arising from the Proposed Development will include change from increased / intensified built form, increased activity including traffic which may impact tranquillity and rural perception and a degree of urbanisation / loss of characteristic landscape elements arising from additional car parking.

The document itself clearly states what the negative impacts will be and again it is worth referring back to the South Downs National Park’s report “Special Qualities of the Sussex Heritage Coast” (October 2018) where such changes would appear to conflict with the vision of the vast majority of questionnaire respondents.

P33. 4.8.10

“Additional car parking would occur next to the farmhouse on the Site, resulting in a reduced visual effect.”

“...significant adverse effects on landscape character of the Site or wider landscape as a result of car parking on the Site would be unlikely.”

With only 47 car parking spaces on-site and only 31 of these for visitors (P12. 3.3.3 above) the idea of using the grass car park at Warren Hill and additional capacity near Birling Gap, or any others for that matter, as overspill appears to have been omitted a second time. 47 cars on site may not cause a substantial issue but transferring the overspill off-site simply transplants the problem to other locations where, at busy times, it may deprive other visitors of parking. It seems a little unlikely that a guesstimated maximum of 151 visitor car trips per day (P39. 4.11.15) will be catered for sufficiently with the provision of just 31 parking spaces unless they are almost all short-duration visits.

P36. 4.9.5

“The Proposed Development will cause increase in traffic flows in the area; however, it is expected that these increases will be too small to result in significant impacts.”

Any increase will be detrimental to the environment nearby and enroute. However, over a large area of the land around Beachy Head it would be hard to make things worse as currently noise from traffic and constant aeroplane pleasure flights already makes it difficult to enjoy the ambient sounds of the countryside in a tranquil setting.

P37. 4.10.5

“...in order to meet the aims of the Levelling Up Fund bid, there will be a beneficial effect for the population, including through the start-up business space, cultural and education enrichment opportunities, provision of new jobs and community engagement.”

All things that could be better achieved with little environmental impact if based in the town centre where there are several large vacant premises awaiting innovative new uses already have excellent public transport links, cycle routes and other attractions nearby. A town centre Towner satellite could employ as many people and generate additional footfall to help sustain existing businesses and attract new ones. With many schools unlikely to be able to afford transport hire the range of alternative transport choices would surely make an urban location more attractive when financial viability is paramount. Taxis for staff (P12. 3.3.3 above) travelling between venues would become totally unnecessary.

The House of Lords Environment and Climate Change Committee, 1st Report of Session 2022-23, “In our hands: behaviour change for climate and environmental goals” (Published 12th October 2022) published evidence from a wide range of people and organisations. Page 51 paragraph 169 and page 52 paragraph 169 point ‘d’ in that report shows witnesses referred to a wide range of policy measures that could be used to encourage increased active travel and public transport use. This included suggesting a revised planning process that would prioritise shorter distances between housing and amenities to reduce the need for longer journeys. This principle should apply equally to visitor attractions that require longer than necessary journeys to isolated locations.

P37. 4.11 Transport

This section repeats much of what has gone before. What it omits to mention is the current apparent lack of commitment from the existing public transport providers to enhance their services. This means that at busy times they may already be running at capacity and many of the services are either reduced or non-existent out-of-season. There is also no mention of the inevitability that before many more years Beachy Head Road will close to through traffic when the cliff recedes dangerously close to the road just east of Belle Tout. In around 2011 an engineering report gave the road an approximate fifty-year lifespan. However, other factors related to health and wellbeing have since been discussed that could shorten this timescale. The loss of this circular/through route will directly impact some of the existing services and could make some economically unviable.

In Eastbourne Borough Council’s “Eastbourne Carbon Neutral 2030” update summary November 2021 it restates the pledge that the council will help make Eastbourne Carbon Neutral by 2030. It is difficult to reconcile this pledge with the current proposal that admits it will encourage private car use of which most will be non-electric for the foreseeable future. (The pledge is not restated in the December 2022 update.)

Final Comments.

Having had difficulty finding the report on the SDNP website, and with no mention on or link from Eastbourne Borough Council's website it has limited the time to make a detailed assessment of its content. Others too had the same issue. Once found I could only be told on an email that "if you do have comments, they will need to be submitted promptly."

The change of use from quiet farm to urbanised tourist attraction is quite profound for a site surrounded by nationally and internationally recognised scenery and habitat. The major flaw in the report is that it deals very little with the impact on the land beyond the development site boundary. This may well satisfy the regulations but in doing so it perpetuates the "business-as-usual" mentality that continues to prevail despite proclamations of "climate emergency" and carbon neutral pledges. It omits to evaluate the damage that may be caused to ecosystems and biodiversity beyond the planner's red line. Beachy Head, particularly around the main car park and to the west, is already blighted by excessive visitor numbers and associated wildlife disturbance despite being a SSSI. There can be little doubt that wildlife displaced from the coastal margin finds a haven a short way inland. This area too now seems to be at risk more than ever.