

12 September 2023

Tondra Thom
Parker Dann Chartered Town Planning Consultants
By email only

Dear Tondra

**Town & Country Planning (Environmental Impact Assessment)
(England & Wales) Regulations 2017 – Screening Opinion**

Proposal: Cultural and Education Centre

Location: Black Robin Farm, Beachy Head Road, Eastbourne

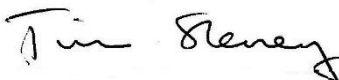
I write further to your email dated 23rd June 2023 with attached report of the same date and subsequent submissions on 14th August requesting a Screening Opinion in relation to the above proposal, planning reference SDNP/23/02662/SCREEN. The South Downs National Park Authority (SDNPA) has formally screened the proposal under the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2017.

In forming the screening opinion, the SDNPA has reached the following conclusion. The development does not fall with Schedule 1 of the Regulations. The development does fall within category 10(b) of Schedule 2 of the Regulations and is within a 'sensitive area', namely a National Park.

Having regard to the selection criteria in Schedule 3 of the Regulations and the location and characteristics of the development, set out in the attached table, it is considered that the project is **not EIA development and does not require the submission of an Environmental Statement** with the forthcoming planning application.

This decision does not prejudice any assessment of the planning application including detailed considerations on matters including landscape, ecology and heritage.

Yours sincerely

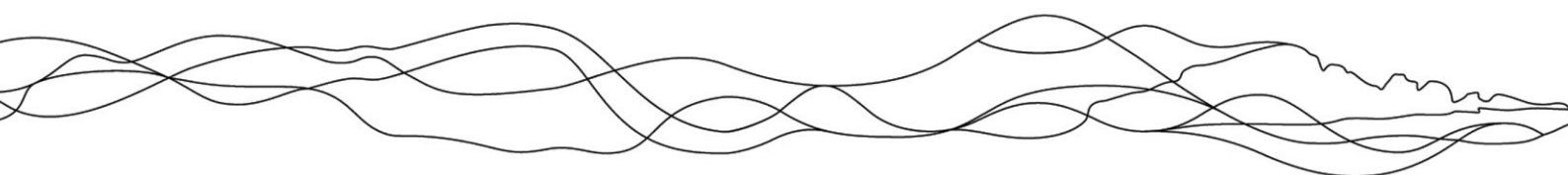


TIM SLANEY
Director of Planning
South Downs National Park Authority

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810
E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie



Characteristics of Development

a) The size and design of the whole development

The 3.08ha site is presently operating as the core facility for a 400 hectare livestock farm. It is proposed to create a cultural and educational facility using a combination of conversion of the historic farm buildings and the existing mid 20th century barn, new buildings for education and support spaces and a new gallery. The development includes new parking areas, public right of way, landscaping and drainage infrastructure.

The size of development is small in EIA terms. The majority of the buildings are being re-used and adapted and the new gallery would be on the site of an existing lambing barn. Retaining the agricultural character is a key part of the vision. There would be a material change to the type of use, character of the site and the intensity of its use. This would not however be significant in EIA terms. Impacts can be minimised, managed and mitigated through the planning process including conditions and obligations. The scheme would not result in an urbanising effect in size or design.

The farming operations will be relocated to other bases within the holding at Ringwood Farm and Crapham Barns. This will not significantly affect the operation of the holding or management of the land in EIA terms, nor will it result in other development that is significant for EIA purposes.

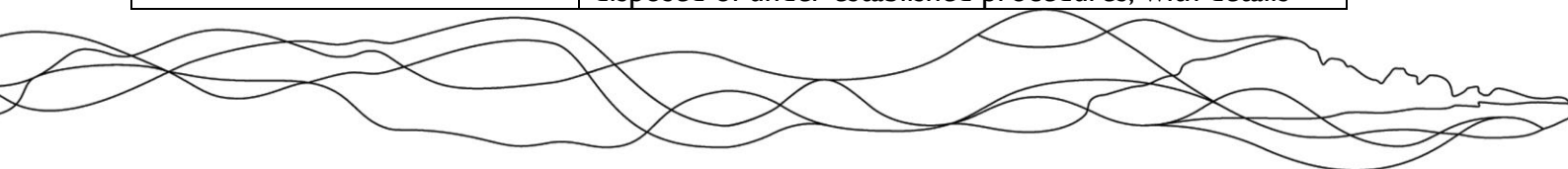
b) The cumulation with other development(s)

The cumulative impacts of the proposal alongside existing tourist and visitor attractions within the immediate locality, which includes a SSSI and Heritage Coast area will not be significant in EIA terms. The commitments to sustainable travel provisions are an important factor, as is the compatibility of the proposal with the existing provisions. The proposal would bring cultural and educational benefits.

The existing circumstances form part of the baseline for assessment purposes and the degree of change would not be significant in EIA terms.

The effects, especially in relation to vehicular activity, visitor pressures and related impacts on the locality, including the SSSI and Heritage Coast and seasonal variations in activity, will however be material to the planning application assessment. They will need to be explained and evidenced in the submissions and appropriate mitigation and enhancements will be secured through planning obligations and/or conditions.

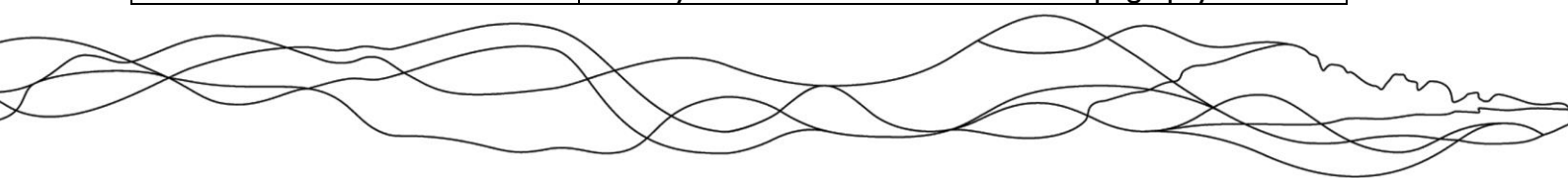
<p>c) The use of natural resources</p>	<p>The proposal will require, on a relatively modest scale, the use of natural resources including water, energy, land and naturally-sourced materials but these impacts will not be significant in EIA terms.</p> <p>The majority of the land within the red line is in existing use and contains existing agricultural development. The proposal will marginally increase the developed area in order to accommodate some visitor parking, coach/bus access. Land is identified to secure a new public right of way and to contribute to the proposed minimum of 25% biodiversity net gain. The BNG will improve the natural capital of the site and surroundings. Material will be re-used or retained on site. The re-use and adaptation of the historic and existing farm buildings is very positive in terms of embodied carbon and life-cycle costing and the carbon cost of new materials can be minimised.</p> <p>Any negative construction and operational effects on natural resources would not be significant in EIA terms and are capable of being minimised through careful design and specification, while positive effects can be delivered. This will include adopting a proactive sustainable construction and resource use strategy, construction environmental management plan, waste management plan, sustainable drainage proposals and landscape and biodiversity plans. These will be demonstrated through planning submissions and secured by conditions.</p>
<p>d) The production of waste</p>	<p>The site presently has no formal foul drainage system. The proposal would introduce a package treatment plant that will treat the effluent for the operational phase of development and discharge clean liquids to ground. This will be separate from the surface water management system which will be designed in accordance with the CIRIA SuDS Manual and will sustainably manage water and maximise biodiversity and amenity value. The use of fresh water and generation of waste water will be minimised through use of efficient fittings.</p> <p>With regard to construction (section 4.14), it is intended to re-use or recycle the majority of the built and natural material on site which is non-hazardous where this is appropriate to the characteristics of the site. Any surplus resources would be managed in accordance with relevant existing waste management procedures with details provided through the planning application or conditions. Any potentially hazardous waste material (i.e. asbestos containing materials) will be properly handled and disposed of under established procedures, with details</p>



	<p>made available through planning conditions as set out in sections 4.7 and 4.14 of the screening report.</p> <p>The extent and nature of operational waste will not be significant in EIA terms, due to the characteristics and scale of the proposed uses.</p>
<p>e) Pollution and nuisances</p>	<p>The report recognises that road traffic is likely to be the main source of pollution within the vicinity of the Site and could affect the SSSI. There would be a notable degree of change between existing and proposed uses during construction and operation important to the planning application but not significant for EIA purposes. The existing baseline pressures are noted. The proposed public transport improvements will be essential to minimise the individual and cumulative effects of the additional visitor and staff activity. Appropriate construction management can be carefully managed through planning conditions.</p> <p>The site has long-standing agricultural use for livestock and is located on chalk therefore pollution risks to ground/groundwater and of contaminated material (i.e. asbestos) are high or moderate. Section 4.7 of the screening report sets out the proposals. A Phase 2 Intrusive Site Investigation will be a condition of any planning permission with appropriate remediation, mitigation and verification requirements. A Construction Environmental Management Plan is a standard requirement for such development and will ensure all risks are known and suitably actioned. No significant effects are anticipated.</p> <p>Paragraph 4.7.10 explains that the proposed ground source heat pump would be a closed loop system and would be installed in accordance with Environment Agency Good Practice Guidance. No permit is needed.</p> <p>Lighting proposals and management will need to be carefully considered to minimise potential harm on landscape and ecological interests and to minimise resource use. Paragraphs 4.8.21-4.8.28 set out the intended provisions with regard to the International Dark Skies Reserve status.</p> <p>With reference to paragraph 4.9.7, the tranquillity of the site is part of the experience of site which is important to maintain to accord with the vision and a suitable contextual response to the landscape sensitivity. The site is currently in active agricultural use with associated noise and activity. The construction phase will be short term and can be managed through planning conditions and established construction best practice. During the</p>

	<p>operational phase, activity generated by visitors and staff including vehicle movements could be material in planning terms and therefore will require careful design and operational practices to be integrated into the proposal, but would not be significant for EIA purposes.</p> <p>Plant/equipment impacts on site and the surroundings are unlikely to be significant given the nature of the uses proposed and can be suitably controlled by conditions.</p>
f) The risk of major accidents / disasters relevant to the development concerned, including those caused by climate change	<p>These risks are considered to be low given the scale and nature of the use. A CEMP will apply and Unexploded Ordnance Assessment is to be undertaken prior to groundworks.</p>
g) The risks to human health	<p>The effect of potential contamination from agricultural operations and risks from site hazards have been considered and the strategy set out in section 4.7 of the screening report is acceptable.</p> <p>The proposal presents a wide range of opportunities to improve human health and wellbeing during the operational phase with no material risks identified.</p>
Location of the development	
a) The existing and approved land use	<p>The site is currently the centre of farming operations for a 400ha livestock farm. The surrounding land is in agricultural use and is crossed by a network of public rights of way. The town of Eastbourne lies to the east beneath the scarp slope. The land is in public ownership and managed by Eastbourne Borough Council. There is no public access to the site itself.</p> <p>The surrounding land will remain in agricultural use. No material detrimental impacts on other land uses in the vicinity are envisaged as a result of this proposal.</p> <p>For the purposes of the Regulations, the site is 'sensitive' because it is within the designated area of the South Downs National Park. The statutory purposes of a National Park reflect landscape and natural environment (including ecological) protection.</p> <p>The PEA (para 4.3-4.4) is incorrect in its assumption that the proposal will not result in a change of use of land save for the areas of parking, and that footfall on site will unlikely change as no residential development is planned and the local area is a known tourist beauty spot. The proposal is for a change of use from a livestock farm to a cultural and education centre that will result in change</p>

	<p>from a low key agricultural use with no public access to an attraction for up to 100,000 visitors per year. The change of use and related development and activity will be fully assessed through the planning application but is considered not significant in EIA terms.</p>
<p>b) The relative abundance, quality and regenerative capacity of natural resources in the area</p>	<p>The site is within the South Downs National Park and is therefore highly sensitive to change. It forms part of a historic functional agricultural landscape characterised by its expansive views, visual and for the most part aural tranquillity and relative absence of non-agricultural development. It is also however an area that attracts a high number of visitors especially during the summer season, due to the combination of attractions and beauty spots in the immediate vicinity including Beachy Head (with visitor centre) the chalk sea cliffs and scarp slope down to Eastbourne, Belle Tout lighthouse and Birling Gap (National Trust) and the proximity to Eastbourne. The area is crossed with an extensive network of public rights of way including the easternmost section of the South Downs Way. Roads are narrow with no footways, and multiple pockets of parking mostly in deep layby style. The area therefore has a high level of sensitivity, low capacity for change and notable visitor pressures as the baseline.</p> <p>The main site is adjacent to the boundary of the Seaford to Beachy Head SSSI and within the Impact Risk Zone. The proposed bus stop on the eastern side of Beachy Head Road would be installed on the road boundary and within the verge which is within the designated area. Section 4.4 recognises some potential for indirect impacts on the SSSI including due to increased levels of nitrogen deposition arising from traffic movements. These impacts would be minimised by a combination of limiting the amount of private vehicle access to and parking available on the site, enhancing public transport and non-motorised travel opportunities and setting aside an alternative designated area for coaches (Beachy Head Visitor Centre Coach Park). The road junction would be re-designed to minimise congestion and idling adjacent to the SSSI but to allow for coach/bus drop off and collection (see section 4.11). Deliveries would be managed to separate these from public access (4.11.15-4.11.16). Risks associated with construction disturbance with regard to air pollution, chemical spills and contaminated run-off would be minimised and monitored through a Construction Environmental Management Plan (CEMP). Chemical spills and contaminated run-off are unlikely to affect the SSSI due to the topography of the</p>



site and the narrow boundary to the SSSI which is on the higher ground. Impacts of such hazards on the ecological interests on site will need to be carefully considered and avoided under a comprehensive CEMP.

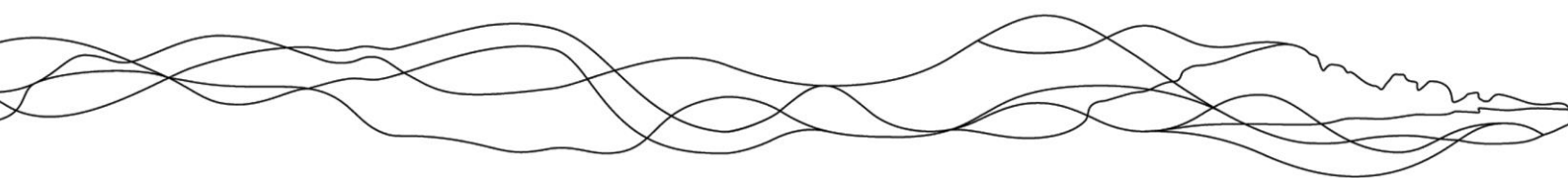
The site forms part of an area with numerous records of protected, rare and notable species, including farmland and ground-nesting birds, birds of prey, invertebrates and plants. There is deciduous woodland immediately north east and lowland calcareous grassland immediately to the east, plus many additional parcels also identified as priority habitats/Habitats of Principal Importance (HPI) within 2km of the site.

It is considered that the impacts of the proposal on the designated areas, protected and notable species and priority habitats immediately adjacent and in the close vicinity, have not been sufficiently considered in the documents provided. Sufficient quality assessments with appropriate study areas would be expected to be submitted with the application including a comprehensive assessment of finds, impacts, avoidance, mitigation and compensation on all receptors whether within the red line or in related land.

The site is within the Sussex Heritage Coast identified under policy SD18 of the South Downs Local Plan (NPPF para 174 & 178), and will be tested against policy criteria as part of the planning application assessment.

The site is also within 1.4km at the closest point to the Beachy Head East Marine Conservation Zone although no effects on this area are envisaged.

With regard to the landscape and ecological sensitivities in this section, the information available to date from SDNPA records and the applicant's submissions identify that while the site and surroundings are landscape and ecologically sensitive and require thorough assessment under the planning application, any negative effects would be very unlikely to be significant in EIA terms and thus do not, in this case, warrant classification as EIA development. They will however need comprehensive assessment through the planning application, with details of mitigation and enhancement embedded into the scheme and appropriate conditions or obligations to be applied if the details are acceptable on merit.



c) The absorption capacity of the natural environment

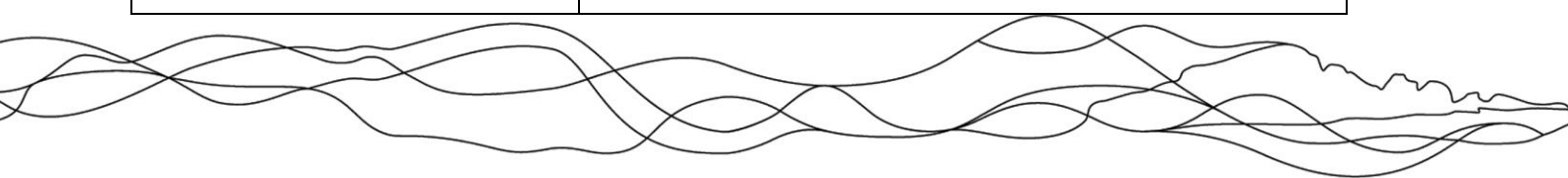
The surrounding landscape has sensitive natural, cultural and aesthetic / perceptual features which are vulnerable to change.

The site is highly sensitive to changes in character and the nature and levels of activity. Activity is expected to vary seasonally, with peaks over the summer months comparable to and aligned with the peaks already experienced at this time of year for all the honeypot sites in the local area. Consequently, the pressure on the absorption capacity of the environment will vary throughout the year. The worst-case impacts are therefore considered.

The built capacity of the site and limited on-site parking will help to regulate visitor numbers and activity levels, with enhanced public transport provisions and additional public rights of way routes aiming to increase the dispersal of existing visitors over a wider area and encouraging more sustainable forms of access. These facilities have potential to ease existing pressures in addition to meeting the needs of the proposed development.

Ecological and other ecosystem impacts are assessed in other sections of this document and will be carefully considered through the planning application, including through ecological and ecosystem services reports.

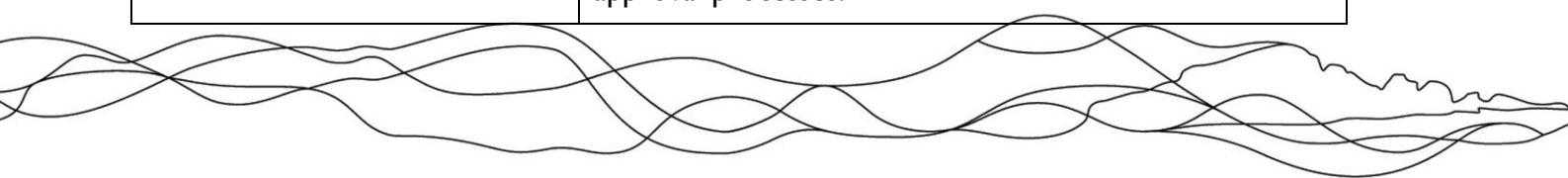
The site is within the Open Downland adjacent to a Major Scarp (Integrated Landscape Character Assessment). It is a dramatic and dynamic landscape with strong agricultural and coastal character and sparse development, in stark contrast to neighbouring Eastbourne below the scarp. The area has high scenic qualities. The land is also a public resource due to Council ownership and extensive PRow networks. Landscape and visual impacts including physical changes to the topography, built form and features of the site and the public experience of the site and surroundings are therefore highly sensitive, as recognised in the LVA. Changes would need to be characteristic to the site and its context, and conserve or enhance the landscape and scenic beauty of the National Park and Heritage Coast. Potential effects are summarised in section 4.8. Impacts would vary between construction and operation with construction effects being more intrusive, but neither are judged significant for EIA purposes. Effects would be appropriately assessed in detail against a strong policy context once plans and the full suite of supporting documents are available through the planning application.



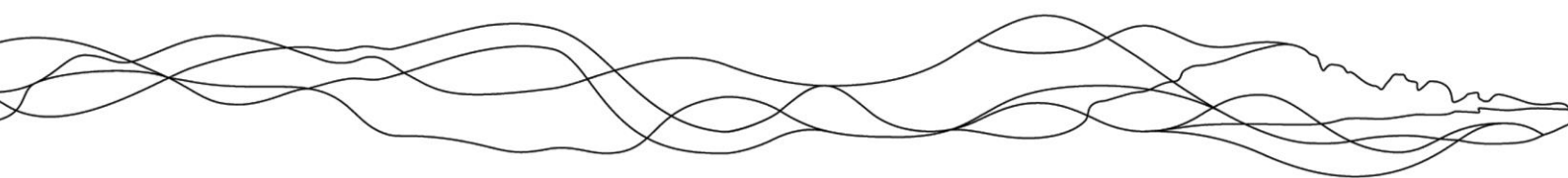
Types and Characteristics of the Potential impact

a) The magnitude and spatial extent of the impact	<p>It is anticipated that the effects of the development will primarily be at the local level with some potential impacts on elements that may have county or regional level significance (i.e. built heritage, ecology) not being significant in EIA terms but which will be carefully considered as part of the planning assessment.</p> <p>The landscape and visual impacts will be localised.</p> <p>The resultant use may attract visitors from further afield.</p> <p>The educational, cultural and socio-economic benefits of the proposal are considered to be an advantage.</p>
b) the nature of impact	<p>While construction impacts would be temporary and mostly reversible, operational impacts including the change of use and physical development would be permanent.</p> <p>The site has notable heritage value, both in terms of built and buried assets and their landscape setting.</p> <p>Excavation is proposed to form the gallery, provide the ground source heating systems and drainage systems, and level areas for parking. These works could reveal assets of potentially regional significance in addition to any unknown assets. It is considered that potential impacts would be moderate not low. Consideration should be given to whether trial trenching would be appropriate to understand potential impacts prior to development.</p> <p>Some sections of the non-designated historic farm courtyard groupings are proposed for demolition, including elements identified to have value (i.e. cow shed, west parlour). This would give rise to moderate adverse effects at a local to regional level. Recording would assist understanding, as would respecting the established historic agricultural character, plan and form through the newbuild elements and reusing materials. Loss of fabric and form would need to be balanced against the benefits.</p> <p>The restoration and re-use of the remaining assets on site would in principle be positive for the assets and for public appreciation and education. The setting of the heritage assets would be altered due to the change of use and development including the proposed gallery. The details of the physical and any character changes will be assessed through the planning application; detailed advice in this regard has been given through the pre-application process. The changes proposed would not undermine the ability to understand the significance of either the</p>

	<p>constituent parts of the historic farmstead or the group as a whole. Overall these impacts would be material for the planning application but not be significant in EIA terms.</p> <p>The Proposed Development will cause an increase in traffic flows in the area however, it is expected that these increases would not be significant for EIA purposes, and mitigated through minimising parking and maximising sustainable transport commitments and initiatives (section 4.9.5)</p> <p>Ecological impacts have been considered above.</p> <p>With regard to socio-economic factors (section 4.10), the farming business would be provided with more suitable modern facilities to better manage the land. The loss of a small amount of tourist accommodation on site would be outweighed by the creation of a visitor attraction and destination. Cultural and educational benefits will be a positive outcome.</p>
<p>c) The transboundary nature of the impact</p>	<p>The site is wholly within the South Downs National Park close to the boundary with Eastbourne. Due to the nature and location of the site and proposal there will be a strong interrelationship between the land within and outside of the National Park which would be positive. There would be no wider impacts beyond other boundaries.</p>
<p>d) The intensity and complexity of the impact</p>	<p>The proposal would result in a more intensive use of the site, with some impacts during construction and greater and different impacts during operation. Construction impacts would be temporary. The impacts would not be complex or intense in a harmful way for EIA purposes.</p> <p>Landscape and visual, cultural heritage and wildlife effects together with opportunities for public understanding are the most important considerations given the National Park designation and the statutory purposes. For the reasons identified within this document, these impacts would not be significant in EIA terms but will be assessed through the planning application assessment.</p>
<p>e) The probability of the impact</p>	<p>If planning permission is granted, there is a high probability that the development would go ahead. The impacts during construction would be temporary. Impacts during operation would, of course, be permanent. All can be managed to minimise disturbance and maximise benefits with carefully worded planning conditions and obligations, supported by other technical approval processes.</p>



<p>f) The expected onset, duration, frequency and reversibility of the impact</p>	<p>The impacts from both the demolition and construction phase would be for a temporary period only. The physical works would be irreversible. Operational effects would be controlled by planning conditions in line with mitigation measures to be agreed to minimise harm and maximise benefits. Full details of operational requirements are not set out in the Screening Request although more information has been made available to the SDNPA through the corresponding pre-application enquiry which are satisfactory for the purposes of this assessment.</p>
<p>g) The cumulation of the impact</p>	<p>The Screening Report considers existing circumstances which are suitable to be captured as part of the baseline for assessment of impacts. Government guidance on EIA refers to existing and or approved developments under cumulative impacts and caselaw recognises ‘existing or reasonably foreseeable developments’ to be fairly considered under cumulative impacts.</p> <p>The SDNPA consider existing development and activity in the locality to be material to the assessment of cumulative impacts, in particular in relation to transport, landscape and ecology matters. However as the potential impacts would not be significant in EIA terms, these matters can be appropriately assessed and dealt with under the planning application. All details are therefore expected to form part of the submission.</p>
<p>h) The possibility of effectively reducing the impact</p>	<p>The impacts of the proposal are considered to fall under the threshold of requiring further assessment under EIA Regulations. Where potential impacts are identified, reducing the impacts relies on the overarching and headline mitigation proposals which are included within the Screening Report and associated appendices. A summary of all the embedded and additional mitigation to be relied upon is included in table 5.1, where any difference in approach between the construction and operational phases have been identified. Mitigation commitments include a travel plan, written scheme of investigation for archaeological deposits, building recording for built heritage, using a landscape-led approach for proposed changes, a landscape strategy using native species, compensatory roost sites for bats, CEMP, lighting to comply with Dark Skies TAN, further contamination studies, noise limits for fixed plant, new PRow, and additional bus provisions.</p> <p>The forthcoming planning application will be expected to provide the details of and secure these elements along</p>



	with any other necessary mitigation and enhancement provisions in order to comply with planning policy and the statutory purposes and duty of the South Downs National Park.
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