

South Downs National Park Public Inquiry

Part 2: Boundaries

The Cliffs - Brighton to Newhaven *(Section P, Maps 29-31)*

Proof of Evidence

by

Brighton Urban Wildlife Group

on behalf of



November 2003

1 Introduction

- 1.1 The South Downs Campaign (SDC) in conjunction with Brighton Urban Wildlife Group (BUWG) submits the following proof of evidence for the boundary of the proposed South Downs National Park, within Section P, Maps 29 - 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 proof of evidence is part of a series of proofs of evidence to be submitted 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, Maps 29-31: The Cliffs – Brighton to Newhaven

2.1 Description of the Boundary

- 2.1.1 This section of the SDC’s proof of evidence is primarily concerned with the cliffs running east from Black Rock, Brighton (OS grid ref. TQ335033) to Castle Hill, Newhaven (OS grid ref TQ 450 002).
- 2.1.2 The SDC submits that the whole of the cliff face from Black Rock to Newhaven should be included in the National Park. This addition would join with the designated National Park boundary at both Roedean and Telscombe. Elsewhere it is proposed that the National Park boundary should run along the southern edge of the A259, except where the urban fringes of Rottingdean, Saltdean, Telscombe and Peacehaven come south of the road. In this instance the southern edge of the urban fringe should be taken as the boundary. The exception is east of Peacehaven where the proposed boundary extends inland slightly to include the Site of Nature Conservation Importance (SNCI) at Chene Gap and Rushy Hill and the Local Nature Reserve (LNR) at Castle Hill.
- 2.1.3 It is not proposed that the Brighton Marina should be included.
- 2.1.4 It is proposed that the National Park should have an open boundary to the sea, just as the SDC is recommending from Tide Mills to Eastbourne. The boundary can be seen on the maps in Appendix A⁴.

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

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

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

2.2 Justification Against Criteria – Natural Beauty

- 2.2.1 The iconic chalk landscape of the South Downs is strikingly demonstrated in the dramatic near-vertical white chalk cliffs between Brighton and Eastbourne. This is the only place where the chalk geology is clearly and impressively visible. The Heritage Coast of the Seven Sisters and Beachy Head is an outstandingly remote and dramatic, but relatively inaccessible, coastal cliff landscape. By contrast, the cliffs between Brighton and Newhaven, though also forming a dramatic coastal landscape with a strong sense of place: the context of ‘Brighton-by-the-Sea’, are fully accessible (see below). The whole of the cliffs are designated a Site of Special Scientific Status (SSSI)⁵ while the section of cliffs at Telscombe Tye is also designated as part of the Area of Outstanding Natural Beauty (AONB). In addition, the cliffs between Roedean and Rottingdean, including some of the land to the north of the marina, are designated as an Area of Important Landscape and Environmental Value (AILEV) in the existing Brighton Local Plan Proposals Map⁶.
- 2.2.2 These cliffs provide a distinctive character that is the South Downs but also represent the wider feeling in the national consciousness that they are England. In October 1999 there was a public inquiry (the ‘Portobello Inquiry’) which looked at proposals for sewage treatment works at Telscombe (GR TQ 394 014). When dismissing an appeal for development in this area (Telscombe) the Inquiry Inspector said that: *“the coastline has significance in its own right, in part because of the value of this stretch of coast as a “separate world” ...and in part because as PPG20 recognises “The coast is an important national resource”. An additional dimension arises because the chalk cliffs between Brighton and Newhaven, including Portobello, are a part, albeit not the most famous or unspoiled part, of the “White Cliffs” of the South Coast. Because of their relationship to the English Channel and channel crossings to and from Europe, the White Cliffs have a particular place in the national consciousness”*⁷.
- 2.2.3 The Inspector also said that: *“the proposals would seriously harm the character and appearance of this stretch of undeveloped coast. In addition to the visual damage which would seriously detract from the amenity value of the clifftop there would be the physical loss of an extensive area of relatively accessible foreshore in a secluded and tranquil setting.”*⁸ This emphasises the value and beauty of this area, in addition to its significance described in paragraph 2.2.2 above.
- 2.2.4 These cliffs are near-natural, having had only minor engineering works altering them over the many years – most of which was done in the 1930s. Most significantly, works included a promenade walk and some “re-profiling” to reduce the sheerness of the cliffs to make them safer for public access (see section 2.3 below). The foreshore has been and is being significantly improved and there are now fewer groynes than

⁴ Maps 1 & 2, Appendix A – Inquiry Doc. No. 3275/10/2

⁵ see Appendix B, English Nature’s Brighton to Newhaven Cliffs SSSI Citation – Inquiry Document No: 3275/10/2

⁶ Brighton Borough Local Plan Proposals Map – Inquiry Document No: CD 099

⁷ Appendix C, Inspector’s Report for Southern Water Services’ Portobello Appeal, Telscombe Cliffs, East Sussex, paragraph 5.2.29 – Inquiry Document No: 3275/10/2

⁸ Appendix C, Inspector’s Report for Southern Water Services’ Portobello Appeal, Telscombe Cliffs, East Sussex, paragraph 5.2.30 – Inquiry Document No: 3275/10/2

when the AONB was designated in the 1960s. These are being replaced with a smaller number of more natural rock defences.

- 2.2.5 There are only two major developments in this section, the Brighton Marina and the water treatment works at Portobello. The Brighton Marina is excluded from the SDC boundary proposal. The Portobello water treatment works is a pocket of development that is insignificant in the overall sweep of the cliffs from Brighton to Newhaven and on to Eastbourne.
- 2.2.6 The cliffs are renowned for their impressive, nationally important geology, the reason for their designation as a SSSI. One hundred million years of evolution of the chalk is clearly visible in the dramatic and accessible cliff profile, crucial to the appreciation of the wider chalk landscape. The Portobello Inquiry Inspector also stated: “*my view is that the natural appearance of the cliffs and foreshore at Portobello are an important component of the character of the site as a coastal SSSI.*”⁹ He then went on to say that: “*It is certainly this wider context of the SSSI that promotes interest in geology, not least from the possibilities of beachcombing for fossils, and promotes support for its continuing protection.*”¹⁰
- 2.2.7 As well as being designated a SSSI, the Brighton to Newhaven Cliffs are also a Geological Conservation Review Site. This means that they are considered of national importance for education and research in earth sciences¹¹. This classic marine cliff landform is much studied by experts and admired by the ordinary public, so has both a considerable scientific interest and high amenity and leisure value. The Saltdean cliffs have been cited as “*...probably the finest example of conjugate normal faults in the Chalk of southern England.*”¹² The SSSI citation states that the landform has attracted scientific interest for over 150 years. The notable geologist Gideon Mantell first described this area in the 1820s. In the early twentieth century, Edward Martin studied this area in detail and gave it considerable space in his account, with copious references and several mentions of the rich finds, in particular, mammalian fossils¹³.
- 2.2.8 This coastal strip is also designated a SSSI because of its flora and wildlife¹⁴. The assemblage of cliff-face plants is unique to the area, both rare and important nationally. In particular, the Hoary Stock *Matthiola incana* maritime plant, is only found in this part of the United Kingdom. This is complemented by a range of other maritime plants, with maritime cliff-top chalk grassland, Sea Lavender and Thrift, and a host of other chalk grassland specialists, such as colonies of several thousands of

⁹ Appendix C, Inspector’s Report for Southern Water Services’ Portobello Appeal, Telscombe Cliffs, East Sussex, paragraph 5.2.20 – Inquiry Document No: 3275/10/2

¹⁰ Appendix C, Inspector’s Report for Southern Water Services’ Portobello Appeal, Telscombe Cliffs, East Sussex, paragraph 5.2.21 – Inquiry Document No: 3275/10/2

¹¹ Appendix C, Inspector’s Report for Southern Water Services’ Portobello Appeal, Telscombe Cliffs, East Sussex, paragraph 1.3.6 – Inquiry Document No: 3275/10/2

¹² see Appendix B, English Nature’s Brighton to Newhaven Cliffs SSSI Citation – Inquiry Document No: 3275/10/2

¹³ Sussex Geology by Edward A. Martin, FGS, published by Archer & Co. 1932, Appendix D – Inquiry Document No: 3275/10/2

¹⁴ see Appendix B, English Nature’s Brighton to Newhaven Cliffs SSSI Citation – Inquiry Document No: 3275/10/2

Autumn Ladies Tresses. Seabirds, such as Fulmar, gulls, Stock Dove and Peregrine Falcon also colonise the cliffs. The wave-cut platform (chalk reef and shingle beach) is also rich in biodiversity.

- 2.2.9 East of Peacehaven, on the cliff-top, the proposed boundary includes a SNCI at Chene Gap and Rushy Hill. It also includes Castle Hill, which is designated both as a SNCI and a Local Nature Reserve. At Castle Hill, the historic Napoleonic Fort at Newhaven, which is firmly embedded within the cliff and a Scheduled Ancient Monument, has excellent interpretive facilities.
- 2.2.10 Behind the Brighton Marina lies an important raised beach. The Black Rock raised beach (200,000 years old), is also classified as a Regionally Important Geological Site, as are cliffs to the east. The Quaternary Research Association considers “*the site is unique as far as the Chalk coastline of southern and eastern Britain is concerned.*”¹⁵ The Association also notes that “*the exposures at Black Rock are fully as important from a scientific point of view as those at Birling Gap.*”¹⁶ Black Rock is the last exposed section of the famous “Elephant Beds” or “Coombe Rock”, between the Old Steine & Black Rock (the other sections are now covered by the concrete of Marine Parade). These “Elephant Beds” are full of the bones of Mammoth, Woolly Rhino & Ice Age Horse.

2.3 Justification Against Criteria – Opportunities for Open-Air Recreation

- 2.3.1 The SDC strongly contends that this area provides a markedly superior recreational experience, for it gives real contact with chalk cliff geology, beach and sea, and the associated flora and wildlife of these land- and seascapes. There is the invaluable sense of place, connecting people with the natural world. The link with the entire South Downs exists; one can experience today’s marine world joined to its 100 million year old fossil ancestor.
- 2.3.2 The SDC considers that whether a casual visitor or a scientific specialist, this area lends itself to a unique understanding and enjoyment of the South Downs and its special qualities. The fully accessible nature of the area means it can be admired from a number of vantage points, including:
- From above, walking the cliff-top strip, off-road, on a traffic-free walk from Brighton to Newhaven on the SSSI chalk grassland;
 - Along the tranquil and often ‘wild’ route below, either paddling in the sea (exploring the numerous rock gullies and pools, rich in marine life) or on the beach;
 - Along the undercliff walk from Black Rock to East Saltdean;
 - At Portobello / Telscombe Tye;
 - At Peacehaven;

¹⁵ Quaternary Research Association Letter, 3rd paragraph, Appendix E - Inquiry Document No: 3275/10/2

¹⁶ Quaternary Research Association Letter, 7th paragraph, Appendix E - Inquiry Document No: 3275/10/2

- At Newhaven.
- 2.3.3 The area feels part of an extensive landscape, whether high up on the clifftop or down near the foot of the cliffs. The openness of the sea next to the towering cliffs or the long views across Brighton and the Downs gives a feeling of being ‘away from it all’, despite, in some cases, being very close to the built-up areas.
- 2.3.4 This area receives thousands of casual visitors and a regular supply of students from the local academic institutions. The SDC submits that having total free access to the geology and wildlife of the chalk is an important factor. Almost all of the undeveloped land along the top of the cliffs is in public ownership and management, providing the ideal foundations for the National Park. The western end lies within the ownership of Brighton & Hove Council, while Telscombe Tye, owned by Telscombe Town Council, is common land, with full open access and is an important amenity for local people and visitors alike, with good access to the beaches. Lewes District Council owns land to the east of Peacehaven at Chene Gap and Castle Hill where access is uninhibited.
- 2.3.5 There are also several public rights of way linking to the wider Downs. There is a dedicated cycle path running from Brighton to Rottingdean, forming part of the National Cycle Network, thus fully promoting sustainable access. Several buses pass every hour along the entire strip (along the A259 and spurs off it). There is a range of facilities in the area, such as cafés, both above and below the cliff (eg. Roedean café above on the north side of the road; Ovingdean café below on the promenade, parking and facilities at the beach at Newhaven), shops and accommodation (eg. Rottingdean, Saltdean and Peacehaven).
- 2.3.6 The undercliff walk is a real ‘access for all’ path, regularly used by walkers, cyclists, and people with pushchairs or wheelchairs. This walk is a key to the exceptional recreational experience provided by these cliffs. It is from here that the chalk geology can best be appreciated, being literally ‘in your face’. It thus fulfils a recreational need at the same time as providing an exceptional opportunity to educate visitors about the formation of the South Downs. This could be developed in the context of the National Park.
- 2.3.7 The popularity of this area for recreation is reflected by the number of people who have objected to the exclusion of the cliffs, at Telscombe Tye, from the National Park. Thousands more also objected to the proposed Portobello sewage works. Given that the proposals would have been largely invisible from people’s homes, it would seem most likely that people objected to the development because it would have resulted in the loss of an important and special place for recreation.

2.4 Additional Considerations

- 2.4.1 This area is a critical link between the terrestrial and marine environments demonstrating the need for holistic sustainable management of the two. Whilst this public inquiry does not directly address the issue of marine National Parks, the SDC considers that the South Downs National Park should also include marine areas. The

marine area and the chalk cliffs are inextricably linked. A demonstration of the need for integrated management is evident in the upcoming public inquiry on a proposal by Brighton and Hove Council to carry out cliff stabilisation works. English Nature is objecting on the basis that works will include meshing and rock bolting the cliffs which “*would result in significant obscuring of, as well as physical damage to... the site*”¹⁷.

- 2.4.2 The Countryside Agency excluded the cliffs because of the development of the foreshore with groynes and the recreational developments along the coastal cliffs. The Agency also drew attention to the fact that the land immediately to the north is built up or does not merit inclusion and their inclusion would create a number of ‘holes’ around settlements such as Saltdean. The SDC has already demonstrated that the groynes are being replaced and is not proposing the inclusion of the Brighton Marina. The SDC acknowledges the built environment to the north, but does not regard this as a reason for exclusion of the cliffs for the reasons set out above. The SDC fully supports the Countryside Agency’s objections to creating ‘holes’ within the National Park. The SDC considers, however, that a distinction can be drawn between a ‘hole’ within the inland part of the National Park and one on the coast, created by the inclusion of coastal cliffs. The two are different in landscape terms, there being no obvious ‘island’ of development surrounded by National Park when coastal cliffs provide part of the surrounding National Park. The development does not impinge on the quality of the National Park landscape along the coastal area in the way it would inland. Nor are the potential management problems comparable.
- 2.4.3 The SDC also proposes a small addition to the boundary to the east of Brighton to include Roedean School and St Dunstan’s, a rehabilitation & rest home, linking the cliffs to the wider National Park (see Map 1¹⁸). From the north-west, the designated boundary sweeps down through Roedean Valley, then divides to exclude Roedean School and St Dunstan’s, both listed buildings, as well as wildlife-rich grassland and a miniature golf course before stopping short of the cliffs and the sea, at the A259.
- 2.4.4 Roedean School has had a cultural attachment to the Downs for over a hundred years, often referenced in literature, both directly and indirectly, e.g. immortalised in the West End play ‘Daisy Pulls It Off’. St Dunstan’s too has a solid attachment to the Downs, a more recent architectural addition to the landscape than Roedean, but nonetheless a distinctive building with its symbolic biplane-like appearance reminiscent of wartime pilots flying over the chalk cliffs. When viewed from the Downs, such as near Woodingdean, these buildings are noticeable in the landscape. They do not detract from the landscape and if anything are a feature of it, sweeping the eye from the rolling downland to the sea beyond.
- 2.4.5 The characteristic maritime chalk grassland to the south-east of St Dunstan’s anchors the sense of place and yields some real treasures amidst its highly diverse flora, including several thousands of Autumn Ladies Tresses either side of the miniature golf course. This area is an intrinsic part of the sweep of open downland. Roedean café and the miniature golf course, adjacent wildlife-rich grassland, also provide

¹⁷ Appendix F – Inquiry Document No: 3275/10/2

¹⁸ Maps 1, Appendix A – Inquiry Doc. No. 3275/10/2

recreational opportunity. The SDC considers that inclusion of this area would give a much more straightforward boundary and ensure a wide sweep of downland to the sea beyond being included within the National Park in close proximity to the urban conurbation of Brighton.

- 2.4.6 The SDC considers that linking the cliffs, coastal land and seascape with the wider downland creates an integral National Park.
- 2.4.7 The cliffs at Telscombe Tye lie at present within the Sussex Downs AONB. If not included within the National Park, it will remain as an AONB remnant and is likely to lose this status and protection when the AONB Revocation Order is considered at the public inquiry. This land would therefore be at higher risk of built development with a potentially detrimental effect on the landscape setting of the National Park.

3 Recommendation

- 3.1 The SDC considers this area meets the statutory criteria and Countryside Agency's approach for defining National Park boundaries and requests that the Inspector recommends to the Secretary of State that the boundary be amended to include the Brighton to Newhaven cliffs in the South Downs National Park. The SDC also requests that the Inspector should recommend the inclusion of a small area of downland to the east of Brighton, including Roedean School and St Dunstan's in the National Park. The SDC considers that these areas also meet the criteria for inclusion