

Access and Sensitive Features Appraisal
**Appraisal of possible environmental impacts
of proposals for England Coast Path between
Shoreham by Sea and Eastbourne Pier**

Natural England's Report to the Secretary of State



Contents and arrangement of this report

This report records the conclusions of Natural England's appraisal of any potential for environmental impacts from our proposals to establish the England Coast Path in the light of the requirements of the legislation affecting Natura 2000 sites, SSSIs, NNRs, protected species and Marine Conservation Zones.

The report is arranged in the following sections:

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| 1. Summary | <i>A summary of our conclusions, including key mitigation measures built into our proposals.</i> |
| 2. Scope | <i>In this part of the document we define the geographic extent for the appraisal and the features that are included.</i> |
| 3. Baseline conditions and ecological sensitivities | <i>In this part of the document we identify which features might be sensitive to changes in access, and rule out from further consideration those that are not.</i> |
| 4. Potential for interaction | <i>In this part of the document we identify places where sensitive features are present and whether there could, or will not, be an interaction with proposed changes in access.</i> |
| 5. Assessment of impact-risk and incorporated mitigation measures | <i>In this part of the document we look in more detail at sections of coast where there could be an interaction between the access proposal and sensitive features. We discuss possible risks to sensitive features and explain how these have shaped the design of our proposals and/or led to the inclusion of specific mitigation measures.</i> |
| 6. Conclusions | <i>In this part of the document we record our formal conclusions, including those for our Habitats Regulations Assessment.</i> |
| 7. Establishing and maintaining the England Coast Path | <i>In this part of the document we describe how the access proposal would be implemented and arrangements for ongoing management and maintenance once coastal access rights are in place.</i> |

This appraisal should be read alongside Natural England's related Coastal Access Report in which the access proposal is fully described and explained

<https://www.gov.uk/government/publications/england-coast-path-from-shoreham-to-eastbourne-comment-on-proposals>

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1. Summary

1.1 Introduction

Natural England has been asked by government to make proposals for a National Trail that will be a continuous walking route around the coast of England. This report concerns the potential impacts on nature conservation of establishing the new route for the stretch of the west and East Sussex coast between Shoreham by Sea and Eastbourne. We describe the conclusions of our appraisal and how we have modified our proposals to take account of potential impacts.

1.2 Background

There are a number of protected sites along this stretch of coast, including SSSI and MCZ designations (see section 2.2 for details of the sites involved). In our appraisal we have considered whether changes in recreation as a result of our proposals might have an impact on any of the features associated with these designated sites, or other protected species that occur along this section of coast. The main features of interest for this stretch of coast are summarised in Table 1 (see section 2.4 for a full list of designated features).

Table 1. Description of the main features of interest

| Interest | Description |
|---|---|
| Brighton to Newhaven Cliffs SSSI | Includes chalk cliffs, beach foreshore and chalk grassland areas between Black Rock, Brighton Marina and Newhaven Cliffs. |
| Seaford to Beachy Head SSSI | Includes chalk Cliffs, the estuary at Cuckmere Haven, beach foreshore and chalk grassland areas between Seaford Head and Eastbourne. |
| Beachy Head West MCZ | Includes inter-tidal areas. Located between Black Rock, Brighton to Beachy Head Lighthouse. |
| Beachy Head East proposed MCZ | Includes inter-tidal areas. Located between Beachy Head Lighthouse to St Leonards, towards Hastings. |
| Castle Hill LNR | Local Nature Reserve located on headland on west side of Newhaven Harbour adjacent to Newhaven Fort. Owned and managed by Lewes District Council. |
| Seaford Head LNR | Local Nature Reserve located on Seaford Head between Seaford Golf Course and Cuckmere Haven, owned by Seaford Town Council and leased to Sussex Wildlife Trust. |
| Sites of Nature Conservation Importance | Basin Road South (Shoreham Harbour), Volks Railway, Black Rock Beach, Brighton Marina, Cliff grassland (Cairo Avenue, Peacehaven), Peacehaven |

| | |
|---------------------------|--|
| | Heights, Newhaven Cliffs, Tide Mills, Seaford Head, Cliffs below Helen Garden (Eastbourne), Holywell and Crow Nest Steps. |
| South Downs National Park | The England Coast Path is within the National Park at Telscombe Cliffs and East Sussex Heritage Coast between Seaford Head and Holywell, Eastbourne. |
| Sussex Heritage Coast | Where the South Downs meets the sea between Seaford Head and Holywell, Eastbourne. |

1.3 Our approach

Natural England’s approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in section 4.9 Coastal Access: Natural England’s Approved Scheme 2013. We call our internal processes to support this approach ‘Access and Sensitive Features Appraisal’ (ASFA) and this document is a record of our conclusions. The appraisal includes our Habitats Regulations Assessment wherever relevant to the site in question.

Our final published proposal for a stretch of England Coast Path is preceded by detailed local consideration of options for route alignment, the extent of the coastal margin and any requirement for restrictions, exclusions or seasonal alternative routes. The proposals are thoroughly considered before being finalised and initial ideas may be modified or rejected during the iterative design process, drawing on the range of relevant expertise available within Natural England.

Evidence is also gathered as appropriate from a range of other sources which can include information and data held locally by external partners or from the experience of local land owners, environmental consultants and occupiers. The approach includes looking at any current visitor management practices, either informal or formal. It also involves discussing our emerging conclusions as appropriate with key local interests such as land owners or occupiers, conservation organisations or the local access authority. In these ways, any nature conservation concerns are discussed early and constructive solutions identified as necessary.

The conclusions of our appraisal are certified by both the member of staff responsible for developing the access proposal and the person responsible for considering any environmental impacts. This ensures appropriate separation of duties within Natural England.

Where our proposals for the England Coast Path and associated Coastal Margin are relevant to a Natura 2000 site, this appraisal fulfils our duty under the Habitats Regulations 2010 to assess their potential implications in order to ensure no likely significant effect on the site. The formal conclusions relating to this are recorded in Section 6 of this document.

1.4 Aim and objectives for the design of our proposals

The new national arrangements for coastal access will establish a continuous well-maintained walking route around the coast and clarify where people can access the foreshore and other parts of the coastal margin. These changes will influence how people use the coast for recreation. Our aim in developing our proposals for the Sussex coast has been to secure and enhance opportunities for people to enjoy their visit whilst ensuring appropriate protection for scheduled nature conservation features. Objectives for design of our detailed local proposals have been to:

- avoid exacerbating disturbance at sensitive locations by making use of established coastal paths
- where there is no suitable established and regularly used coastal route, develop proposals that take account of the potential risks to sensitive nature conservation features and incorporate mitigation where necessary into our proposals
- clarify when, where and how people may access the foreshore and other parts of the coastal margin on foot for recreational purposes
- work with local partners to design detailed proposals that take account of and complement efforts to manage access in sensitive locations
- where practical, incorporate opportunities to raise awareness of the importance of the Sussex coast for nesting and migratory birds and rare chalk grassland species and how people can help efforts to protect them.

1.5 Conclusion

We have considered whether our proposals might have an impact on any of the features associated with these designated sites, or other protected species and important habitats that occur along this section of coast. We have taken our time to consider all of the features that might be affected.

Where necessary we have carried out an impact assessment, with input from specialists, to ensure our proposals minimise the risk of a detrimental impact. These considerations are summarised in Table 2 below.

In light of the existing high visitor use and current access management along the coast, including interpretation of important habitats, such as vegetated shingle and the chalk grassland present along the clifftops of the South Downs, we consider that our proposals will not create additional risk to the key features along this stretch and specific mitigation measures are not necessary here.

However, we have looked for opportunities to enhance local understanding of the wildlife along the coast here to complement existing access management. Some suggestions by stakeholders include more information on the undercliff walk between Brighton and Saltdean to explain the important marine habitats here and to highlight the unique population of kittiwakes nesting on the cliffs at Seaford Head. If ongoing funding bids are not forthcoming, we propose to develop information signs for the undercliff walk at Brighton Marina and Saltdean. We will also develop signage at the best vantage point to view the unique population of kittiwakes at Seaford Head.

Table 2. Summary of risks and consequent mitigation built in to our proposals

| Location | Risk | Mitigation |
|--|---------|--|
| Brighton to Saltdean Undercliff, Maps 2e & 2h of the main report | No risk | No mitigation, however there is an existing funding bid to provide signage along the undercliff to raise awareness of the important marine habitats here (MCZ). If this funding bid is not successful, some signage could be provided as part of the England Coast Path establishment, prior to the trail opening. |
| Seaford Head, map 4a of the main report | No risk | No mitigation, however, we propose to install new interpretation to raise awareness of important bird life (kittiwakes) at Seaford Head, provided prior to the opening of the trail. |

1.6 Implementation

Once a route for the trail has been confirmed by the Secretary of State, we will work with the four access authorities West Sussex County Council, Brighton & Hove City Council, East Sussex County Council and the South Downs National Park Authority to ensure any works on the ground are carried out with due regard to the conclusions of this appraisal and relevant statutory requirements.

1.7 Thanks

The development of our proposals has been informed by input from people with relevant expertise within Natural England and other key organisations. The proposals have been thoroughly considered before being finalised and our initial ideas were modified during an iterative design process. We are particularly grateful to South Downs National Park Authority, Brighton and Lewes Downs Biosphere (The Living Coast), Lewes District Council, Eastbourne Borough Council, the National Trust, Sussex Wildlife Trust, the Sussex Biological Records Centre, East Sussex County Council and the RSPB and other organisations and local experts, whose contributions and advice have helped to inform development of our proposals.

2. Scope

In this part of the document we define the geographic extent for the appraisal and the features that are included. Note that this appraisal is concerned with ecological, geological and geomorphological features; any other possible sensitivities, including landscape and historic features, are discussed in our coastal access report.

2.1 Geographic extent

See Map C of the Overview (main report) showing the Shoreham-by-Sea to Eastbourne stretch and key statutory environmental designations that occur along it.

2.2 Designated sites

| Section of coast: Site name: | Chapter 1 Shoreham Footbridge, Shoreham-by-Sea to Western Esplanade, Portslade-by-Sea | Chapter 2 Western Esplanade, Portslade- by-Sea to Longridge Avenue, Saltdean | Chapter 3 Longridge Avenue, Saltdean to Seaford Esplanade Longridge Avenue, Saltdean to Pumping Station, Seaford Esplanade | Chapter 4 Seaford Esplanade to Eastbourne Pier |
|---|---|---|---|---|
| Brighton to Newhaven Cliffs SSSI | | √ | √ | |
| Seaford to Beachy Head SSSI | | | | √ |
| Beachy Head West MCZ | | √ | √ | √ |
| Beachy Head East pMCZ | | | | √ |
| Castle Hill Local Nature Reserve (LNR) | | | √ | |
| Seaford Head LNR | | | | √ |
| South Downs National Park | | √ | √ | √ |
| Sussex Heritage Coast | | | | √ |

2.3 Designated features

| Features – of the designated sites listed in 2.2 | Brighton to Newhaven Cliffs SSSI | Seaford to Beachy Head SSSI | Beachy Head West MCZ | Beachy Head East pMCZ |
|---|----------------------------------|-----------------------------|----------------------|-----------------------|
| CG2 - <i>Festuca ovina</i> - <i>Avenula pratensis</i> lowland calcareous grassland | √ | | | |
| EC - Cenomanian-Maastrichtian | √ | √ | | |
| EC - Post-Variscan Structures | √ | | | |
| EC - Quaternary of South-East England | √ | | | |
| Invertebrate assemblage | √ | | | |
| IS - Quaternary of South-East England | √ | √ | | |
| Isolated bird colony - Kittiwake, <i>Rissa tridactyla</i> | √ | | | |
| Reefs | √ | √ | | |
| Aggregations of non-breeding birds - variety of passage species | | √ | | |
| Assemblages of breeding birds - Mixed: Lowland heath, Scrub | | √ | | |
| Coastal vegetated shingle (SD1-3) | | √ | | |
| IA - Coastal Geomorphology | | √ | | |
| IC - Caves | | √ | | |
| Invert. assemblage F111 bare sand & chalk | | √ | | |
| Invert. assemblage F112 open short sward | | √ | | |
| Lowland calcareous grassland (CG1) | | √ | | |
| Lowland calcareous grassland (CG2) | | √ | | |
| Lowland calcareous grassland (CG3-5) | | √ | | |
| Population of Schedule 8 plant - <i>Bupleurum baldense</i> , Small Hare's-ear | | √ | | |
| Population of Schedule 8 plant - <i>Ophrys sphegodes</i> , Early Spider-orchid | | √ | | |
| Populations of nationally scarce butterfly species - <i>Polyommatus bellargus</i> , Adonis Blue | | √ | | |
| Vascular plant assemblage | | √ | | |
| Blue mussel (<i>Mytilus edulis</i>) beds | | | √ | √ |
| High energy circalittoral rock | | | √ | |
| Infralittoral muddy sand | | | √ | |
| Infralittoral rock and thin sandy sediment | | | √ | |

| | | | | |
|---|--|--|---|---|
| Infralittoral sandy mud | | | √ | |
| Intertidal coarse sediment | | | √ | √ |
| Littoral chalk communities | | | √ | √ |
| Moderate energy circalittoral rock | | | √ | |
| Native oyster (<i>Ostrea edulis</i>) | | | √ | √ |
| Short snouted seahorse (<i>Hippocampus hippocampus</i>) | | | √ | √ |
| Subtidal chalk | | | √ | √ |
| Subtidal mixed sediments | | | √ | √ |
| Subtidal mud | | | √ | |
| Subtidal sand | | | √ | √ |
| Peat and Clay Exposures | | | | √ |
| Rossworm | | | | √ |
| European Eel | | | | √ |
| High energy intertidal rock | | | | √ |
| Moderate energy intertidal rock | | | | √ |

2.4 Other features about which concerns have been expressed – where applicable

| Feature | Conservation interest |
|---------------------------|--|
| Coastal vegetated shingle | Shingle beaches at Volks railway and Black Rock, Brighton and Tide Mills (Sites of Nature Conservation Importance) support vegetated shingle which can be vulnerable to trampling. |

3. Baseline conditions and environmental sensitivities

In this part of the document we identify any of the features mentioned above that are potentially sensitive to changes in access, and rule out from further consideration those that are not.

3.1 Aggregations of non-breeding birds - variety of passage species

| |
|--|
| Non-breeding birds - variety of passage species |
| Aggregations of non-breeding birds - variety of passage species. |
| Current conservation status and use of site by features |
| Along this stretch of coast, the sensitive sites that are used by the birds in this feature group: Seaford to Beachy Head SSSI |
| Sensitivities to changes in access |
| The Seaford to Beachy Head SSSI is nationally significant for the numbers of passage birds, which use the Downs as a route-finding landmark. Over two hundred species of birds on passage have been recorded from Beachy Head alone. Rare species that have occasionally been seen include Cirl bunting and Dartford warbler. Conclusion: Due to sensitivities to changes in access this feature group ruled in for further consideration in this appraisal. |

3.2 Assemblages of breeding birds - Mixed: Lowland heath, Scrub

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| Breeding birds - Mixed: Lowland heath, Scrub |
| Assemblages of breeding birds - Mixed: Lowland heath, Scrub |
| Current conservation status and use of site by features |
| Along this stretch of coast, the sensitive sites that are used by the birds in this feature group: Seaford to Beachy Head SSSI. Breeding bird populations include peregrine falcon, raven, fulmar, green woodpecker, stonechat, lesser whitethroat and yellowhammer |
| Sensitivities to changes in access |
| From the Latest Sussex Ornithological Report (2016) Little Egret is an increasing resident, the peak count in November and December at Cuckmere Haven in 2016 was 17 birds. Cuckmere haven is already considered to be a 'honeypot' site with considerable numbers of visitors all year round. |

Conclusion: Due to sensitivities to changes in access this feature group ruled in for further consideration in this appraisal.

3.3 Invertebrate assemblage

| |
|---|
| Invertebrate assemblage |
| Invertebrate assemblage F111 bare sand & chalk Invertebrate assemblage F112 open short sward Populations of nationally scarce butterfly species - Adonis blue |
| Current conservation status and use of site by features |
| Brighton to Newhaven Cliffs SSSI Seaford to Beachy Head SSSI Important invertebrate populations include colonies of the silver-spotted skipper and adonis blue butterflies and several uncommon moths. The invertebrate fauna includes two nationally rare species: the crane fly <i>Gonomyia conoviensis</i> , and the moth <i>Adscita globulariae</i> . The rare Potter Flower Bee is found at Seaford Head. |
| Sensitivities to changes in access |
| The above species use particular chalk grassland species, shrubs, bare sand and chalk which are generally found away from the existing walking routes along the clifftop. As the clifftop and coastal vegetated shingle areas already has open access, it is not considered that there is any increased risk of disturbance to invertebrate species. Conclusion: This feature group is ruled out for further consideration in this appraisal, as they are located in areas that are already CROW open access land, already well used by walkers or are away from the main walking routes. |

3.4 Coastal vegetated shingle

| |
|---|
| Coastal vegetated shingle |
| Coastal vegetated shingle (SD1-3) |
| Current conservation status and use of site by features |
| Because of its rarity vegetated shingle is recorded as a priority habitat under the UK's Biodiversity Action Plan (BAP). Along this stretch of coastline, vegetated shingle is found at two locations on Brighton Beach and at West Beach, Newhaven; Tide Mills at Seaford Bay; Cuckmere Haven; Cow Gap and Holywell near Eastbourne. |

Volks Railway and Black Rock Beach (Brighton) and Tide Mills are Sites of Nature Conservation Interest (SNCI). West Beach lies within the Brighton to Newhaven Cliffs SSSI and Cuckmere Haven, Cow Gap and Holywell are within the Seaford to Beachy Head SSSI.

Sensitivities to changes in access

These areas are already very well used by the public. Potential and known issues with access relate to trampling and driftwood fire sites. Some shingle areas are subject to protection due to their geomorphology or specialised plant communities, both of which are vulnerable to trampling. **Conclusion: Due to sensitivities to changes in access this feature group ruled in for further consideration in this appraisal.**

3.5 Coastal Geomorphology

Coastal Geomorphology

IA - Coastal Geomorphology
 IC - Caves
 EC - Cenomanian-Maastrichtian
 EC - Post-Variscan Structures
 EC - Quaternary of South-East England
 IS - Quaternary of South-East England

Current conservation status and use of site by features

Brighton to Newhaven Cliffs SSSI
 Seaford to Beachy Head SSSI

Sensitivities to changes in access

The main issues would be due to potential interaction and resultant damage due to cliff climbing. This is considered to not be a particular issue for chalk cliffs, as they are not conducive to climbing due to the crumbly nature of chalk. The cliffs are naturally eroding due to the sea, wind, rain and frost, which keeps the geomorphological exposures continuously renewed.

Conclusion: This feature group is ruled out for further consideration in this appraisal, as the coastal geomorphology is located within the seaward coastal margin where the public already has access at low tide.

3.6 Isolated bird colony - Kittiwake

Kittiwake

Isolated bird colony - Kittiwake

Current conservation status and use of site by features

| |
|---|
| Brighton to Newhaven Cliffs SSSI |
| Seaford to Beachy Head SSSI |
| Sensitivities to changes in access |
| <p>From the latest Sussex Ornithological Society (SOS) Report (2016), Seaford Head cliffs (Seaford to Beachy Head SSSI) remains a major nesting site, and the only one in East Sussex. A count of 1120 Apparently Occupied Nests (AONs) was made on 6 Jun 2016. Birds were reported visiting probable nest sites on the cliffs from early march and continued to be reported well into August. With reference to previous SOS reports, the Kittiwake colony has recently moved to Seaford Head from the Newhaven Cliffs (Brighton to Newhaven Cliffs SSSI) from 2011.</p> <p>Their numbers (surveyed by SOS) have shown a marked decline in recent years. Although the reasons are not clear, cliff falls and the changes brought about by climate change in terms of food availability are considered to be the main suspect, with SOS suggesting in 2018 'there have been three cliff falls at Seaford Head in the past month and the entire length of cliff is unstable. This may be the biggest threat to the future of the colony'. The RSPB is currently researching the mechanisms that are driving this decline in kittiwake numbers.</p> <p>As the cliffs at Seaford Head are automatically within the coastal margin, any potential interaction would be due to any cliff climbing. This is considered to not be a particular issue for chalk cliffs, as they are not conducive to climbing due to the crumbly nature of chalk. The cliff top area is already open access land, however as the cliff edge is particularly unstable at Seaford Head, there are warning signs and areas are fenced off. At Splash Point, a major sea defence, there is no particular access along the beach below the cliffs, as there are chalk headlands projecting out into the beach restricting access and the inter tidal wave cut platform is rocky and covered in slippery seaweed. In summary the beach here is therefore considered to be remote with no easy access for the public.</p> <p>Conclusion: This feature group is ruled out for further consideration in this appraisal, as the kittiwake colony is located on cliffs within the seaward coastal margin where the public already has open access along the cliff top and at low tide the beach is not conducive for easy access.</p> <p>NB: A suggestion by stakeholders has been to help improve local awareness of the birds through new fixed information in proximity to Seaford Head. We propose to install information as part of the establishment of the England Coast Path, prior to its opening.</p> |

3.7 Lowland calcareous grassland

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| Lowland calcareous grassland |
| <p>Lowland calcareous grassland (CG1)</p> <p>Lowland calcareous grassland (CG2)</p> <p>Lowland calcareous grassland (CG3-5)</p> <p>Population of Schedule 8 plant - Small Hare's-ear</p> <p>Population of Schedule 8 plant - Early Spider-orchid</p> <p>Vascular plant assemblage</p> |
| Current conservation status and use of site by features |

| |
|--|
| Brighton to Newhaven Cliffs SSSI Seaford to Beachy Head SSSI |
| Sensitivities to changes in access |
| <p>Within the Seaford to Beachy Head SSSI, the chalk grassland area around Beachy Head has Common spotted orchid, Bee orchids and Early spider orchid. Occasionally rare orchids are found including Lizard orchid and Lady orchid. Though these species are particularly sensitive to damage, they are found in longer grass away from the main walked areas.</p> <p>The population of Schedule 8 plant - Small Hare's-ear is a small umbellifer reaching 3cm high at most with minute yellow flowers, located on very short coastal turf upon the cliff edge at Beachy Head. Although this may be sensitive to trampling, it is located away from the line of the trail and trampling is therefore not considered an issue for these species.</p> <p>The South Downs Way National Trail already follows the wide clifftop path between Exceat, the Seven Sisters and Beachy Head to Eastbourne seafront. The proposed coast path will follow the same route as the South Downs Way or other wide, promoted public footpaths along the clifftops.</p> <p>Except for the Seaford Head Golf Course, the clifftop downland used by the trail is open access land with much of it Access Land under CROW.</p> <p>Conclusion: Due to sensitivities to changes in access this feature group is ruled in for further consideration in this appraisal.</p> |

3.8 Marine Fauna

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|---|
| Marine Fauna |
| <p>Blue mussel beds</p> <p>Littoral chalk communities</p> <p>Native oyster</p> <p>Short snouted seahorse</p> <p>Rossworm</p> <p>European Eel</p> |
| Current conservation status and use of site by features |
| <p>Beachy Head West MCZ</p> <p>Beachy Head East pMCZ</p> |
| Sensitivities to changes in access |
| <p>Beachy Head East pMCZ: The area to the east of Beachy Head is characterised by a highly biodiverse sandstone/chalk reef system with important subtidal chalk ledges and peat and clay exposures, supporting littoral chalk communities, Rossworm (<i>Sabellaria spinulosa</i>) reef, sea squirt (<i>Molgula</i>) beds and encrustations of Ross coral (<i>Pentapora foliacea</i>).</p> |

There is also a byelaw restricting hand-gathering of sea fisheries resources in Beachy Head West and can be found [here](#) on the Sussex IFCA website. The marine fauna sites are seaward of the trail within the inter-tidal zone and beyond and will automatically qualify as spreading room. The potential concern is for public safety when out rock pooling, fossil hunting, or bait collection.

Conclusion: This feature group is ruled out for further consideration in this appraisal, as they are located in inter-tidal areas where the public already has access at low tide.

3.9 Marine Geomorphology

| Marine Geomorphology |
|---|
| Reefs |
| High energy circalittoral rock |
| Infralittoral muddy sand |
| Infralittoral rock and thin sandy sediment |
| Infralittoral sandy mud |
| Intertidal coarse sediment |
| Moderate energy circalittoral rock |
| Subtidal chalk |
| Subtidal mixed sediments |
| Subtidal mud |
| Subtidal sand |
| Peat and Clay Exposures |
| High energy intertidal rock |
| Moderate energy intertidal rock |
| Current conservation status and use of site by features |
| Beachy Head West MCZ |
| Beachy Head East pMCZ |
| Sensitivities to changes in access |
| Beachy Head East pMCZ: Most of the Shoals are of sandstone (probably Upper Greensand), outcrops of chalk occur in the north-west part. The reef rises from a surrounding seabed of gravel, muddy sand and sand, and the area is subject to strong tidal currents which reach 2.6 knots at spring tides. The Shoals display a wide range of habitat types within a relatively small area and provide a good example of an offshore sandstone reef. The Horse of Willingdon reef lies approximately 6km east of Eastbourne and is about 1km in length (running NW/SE) and rises from a surrounding seabed of 14m to 5m depth BCD. The reef consists of sandstone bedrock and boulders, with patches of cobbles, pebbles and mixed sediment in between. The bedrock is clearly liable to fracturing, and has been described as “irregular vertical |

fissuring giving an effect like crazy paving”. Elsewhere the bedrock may form horizontal ledges with overhangs, or have irregular gullies up to 1m deep in between large angular blocks.

The geomorphological sites are seaward of the trail within the inter-tidal zone and will automatically qualify as spreading room. The potential concern is for public safety when out rock pooling, fossil hunting, or bait collection.

Conclusion: This feature group is ruled out for further consideration in this appraisal, as they are located in inter-tidal areas where the public already has access at low tide.

3.10 Landscape character

Current conservation status and use of site by features

South Downs National Park & Sussex Heritage Coast

Sensitivities to changes in access

The South Downs has a rich variety of landscapes, including the open downland along the coastline. The stretches of downland contained within this report are well provided with linear walking trails, including part of the South Downs Way national trail and other footpaths, as well as existing Access Land.

The Heritage Coast is the only undeveloped section of Sussex coastline, with unique geology and history. The Heritage Coast is already well provided with footpaths and trails.

Conclusion: This feature is ruled out for further consideration in this appraisal, as no significant infrastructure is proposed that would change the character or experience of the landscape.

4. Potential for interaction

In this part of the document we identify places where sensitive features are present *and* whether there could, or will not, be an interaction with proposed changes in access. Where we conclude there is potential for interaction between sensitive features and our proposals for England Coast Path at a particular location, in Part 5 of this document we consider the circumstances in more detail, including current access provision, how this will be affected by our coastal access proposals, and how use of the site for recreation might change as a consequence.

Our proposals for England Coast Path have two main components:

- Identification and physical establishment of a trail; and,
- Identification of an associated coastal margin.

Trail

A continuous walking trail – the England Coast Path National Trail - will be established by joining up existing coastal routes and creating new sections of path where necessary.

Coastal Margin

An area of land associated with the proposed trail will become coastal margin, including all land seawards of the trail down to mean low water. The full extent of the coastal margin along this section of coast is shown on **Map B – Existing access – Shoreham to Eastbourne**, within the Overview of the main report.

Coastal margin is typically subject to new coastal access rights, though there are some obvious exceptions to this. The nature and limitations of the new rights, and the key types of land excepted from them, are explained in more detail in Chapter 2 of our Coastal Access Scheme¹. Where there are already public or local rights to do other things, these are normally unaffected and will continue to exist in parallel to the new coastal access rights. The exception to this principle is any pre-existing open access rights under Part 1 of the Countryside and Rights of Way Act 2000 (CROW) over land falling within the coastal margin: the new coastal access rights will apply in place of these.

Where public access on foot already takes place on land within the margin without any legal right for people to use the land in this way, the new coastal access rights will secure this existing use legally. Access secured in this way is subject to various national restrictions. It remains open to the owner of the land, should they wish, to continue tolerating other types of established public use not provided for by coastal access rights.

Natural England has powers that mean that we can, where necessary, impose local restrictions or exclusions on the new coastal access rights on grounds set out in the legislation. Such restrictions or exclusions do not apply to public rights of way, or to other types of pre-existing access right other than CROW rights (see above).

4.1 Brighton to Newhaven Cliffs SSSI

Outline of changes in access

Between Black Rock adjacent to Brighton Marina and Newhaven Cliffs, the proposed line of the trail uses existing public access on the Undercliff Walk to Saltdean, then the public footpath along the clifftop to Newhaven. There is also an optional alternative route upon the clifftop public footpath between Black Rock and Saltdean, for when the Undercliff Walk is unsuitable or is temporary closed. This is for safety reasons due to stormy weather or rock falls. Therefore the trail will be using an existing popular walking route along the coast and no new route is being proposed.

Potential for interaction (or lack of it)

Minimal change. As this is already a well-used walking route within a predominantly urban area, it is not predicted that there will be any particular changes with coastal access to existing uses of the area. The seaward coastal margin is narrow, taking in the edge of the cliff top grassland, the cliff and the limited amounts of foreshore to the Mean Low Water mark. Where there are areas of chalk grassland such as at Telscombe Cliffs and between Peacehaven Heights and Castle Hill LNR, the sward is generally high and there are distinct paths which walkers tend to use. As this is already a well-used area, there is unlikely to be any significant change to patterns of existing use on clifftop grassland due to coastal access.

The clifftop is fenced for public safety, thereby preventing access. There are a number of ramps and steps between the clifftop footpath and the Undercliff Walk. The chalk cliffs are nearly vertical and have in places been contoured to help prevent rock falls onto the Undercliff Walk. The British Mountaineering Council (BMC) considers them to be not suitable or desirable for climbing. Therefore it is not considered that there is likely to be any effect on nesting fulmars or kittiwakes, should they start nesting in this area again.

It is not considered that coastal access will have any effect to the geological features.

Where the margin includes areas of accessible foreshore, such as at West Beach, Newhaven and along the Brighton to Saltdean undercliff, localised rock-pooling and swimming is common and unlikely to change due to coastal access. At West Beach, the impoverished vegetated shingle is well away from the clifftop trail, with limited scope for increased interaction due to coastal access.

4.2 Seaford to Beachy Head SSSI

Outline of changes in access

This stretch of coast is well used by walkers, with the Sussex Heritage Coast and several 'honeypot' destinations used by both locals and visitors to view and walk the iconic chalk cliffs. Visitors mainly walk the cliff tops, rather than the undercliffs or foreshore, to view Seaford Head, Cuckmere Haven, the Seven Sisters, Birling Gap and Beachy Head.

The proposed trail uses existing Public Rights of Way, which are already promoted and used by long distance trails, such as sections of the Vanguard Way, Seahaven Coastal Trail between Seaford and Exceat, along the west side of Cuckmere Haven and around Seaford Head. The trail follows the existing South Downs Way National Trail between Exceat and Eastbourne, upon the Seven Sisters and Beachy Head cliff top.

The proposed trail deviates from the South Downs Way in a couple of places onto other promoted public footpaths, firstly at Birling Gap and secondly between Beachy Head and Eastbourne. At Birling Gap, from the west the trails will go around the busy car park via the cliff top viewing platform and steps. By the telephone box adjacent to the coastguard cottages they will ascend directly up the existing steps and main path onto Belle Tout. At Beachy Head, the trails will take a more southerly line towards the coast, using established clifftop footpaths around the lower slopes area to Dukes Drive. This includes using existing public footpaths and walked routes via Frances Bottom, Cow Gap beach access, Whitebread Hole and above Foyle Way to Dukes Drive.

A significant proportion of the clifftop within the proposed coastal margin (especially east of Cuckmere Haven) is already Access Land under the Countryside and Rights of Way Act 2000, and is openly accessible. Some of the land in the coastal margin of the proposed trail across Seaford Head is also open access. Existing patterns of use in the coastal margin are unlikely to change as a result of coastal access.

Potential for interaction (or lack of it)

Low. The trail is proposed along existing well walked routes, including the South Downs Way and other promoted and well used footpaths. It is not predicted that there will be any particular changes with coastal access to affect existing use of the area.

The proposed route of the England Coast Path, near Birling Gap and Beachy Head, is along the clifftops. This has provided an opportunity to align the South Downs Way, in the future, to the proposed coast path to help clarify a single, cliff top route for walkers, and help support the management of the chalk grassland in the area. This has the support of the South Downs National Park.

The seaward coastal margin is generally narrow, just seaward of the trail clifftop path to low mean water. The Sussex Heritage Coast has high chalk cliffs, so access to the beach is only at particular access points along this section of coast. At Seaford Head there is access to the beach via steps at Hope Gap. Cuckmere Haven is extremely popular with both locals and tourists, with easy access to the beach on both sides of the River Cuckmere from Exceat and Seaford Head. Birling Gap is also popular, providing facilities and a viewpoint of the Seven Sisters and Seaford Head, with beach access via steps to the shingle beach and wave cut platform at low tide. Just east of Beachy Head, there is access to the beach at Cow Gap.

At Cuckmere Haven there is a wider seaward coastal margin, as the trail goes inland up the River Cuckmere to cross at Exceat Bridge. However, the coastal margin is already mostly open access land on both sides of the river. On the west bank, Seaford Head LNR is access land managed by Sussex Wildlife Trust and the National Trust manage Chyngton Farm, which includes the estuarine environment. On the east bank is the Seven Sisters Country Park, which is Open Access Land under CROW and is managed by East Sussex County Council.

4.3 Beachy Head West MCZ

Outline of changes in access

The Marine and Coastal Access Act has enabled the creation of Marine Conservation Zones (MCZs), a new type of Marine Protected Area. The purpose of MCZs is to protect nationally important marine

wildlife, geology and geomorphology. Sites are selected to protect not just the rare and threatened, but the full range of marine wildlife.

The Beachy Head West Marine Conservation Zone is located offshore parallel to the East Sussex coastline between Brighton Marina in the west to Beachy Head Lighthouse in the east. There is a break in the MCZ designation at the entrance to Newhaven Harbour. The trail uses existing access along this section of coastline, including the Undercliff Walk and clifftop footpaths, with the seaward coastal margin to mean low tide. The MCZ protects a total area of approximately 24km². The MCZ partially overlaps with the Seven Sisters voluntary marine conservation area. These sites contain some of the best examples of chalk habitat in the south east region, with the chalk reefs and gullies supporting specialised communities of animals and seaweeds. Additionally, the sites are known to support the rare short-snouted seahorse.

Within the MCZ there is an extensive intertidal wave cut chalk platform and subtidal chalk ridges with the surface pitted with holes. These holes are created by burrowing molluscs and, once empty, can be inhabited by and provide shelter to animals such as crabs and anemones. Blue mussel (*Mytilus edulis*) beds and native oysters (*Ostrea edulis*) are found densely packed on the chalk ridges creating a mosaic of habitats.

Within the shallower waters the rare short-snouted seahorse (*Hippocampus hippocampus*) can be found. These are a type of fish, and are one of only two species found in UK waters. Seahorses have excellent eyesight and hunt for their food by sight. They feed on a variety of small crustaceans, such as shrimp, but do not have teeth so instead suck food up through their snouts. Seahorses require protection as they are particularly vulnerable to threats which cause damage to their habitat.

Management of sites is currently being prioritised nationally according to the potential or actual adverse impacts of activities on the features designated in relation to fishing activities. Many activities within the marine environment are regulated through marine licenses.

Potential for interaction (or lack of it)

The public already generally has access to the shingle beach and inter-tidal area within the coastal margin. However, as this is a coastline with high chalk cliffs this access varies, with only some areas having easy access at sea level adjacent to settlements such as Rottingdean, Newhaven and Seaford or at Tide Mills and Cuckmere Haven. Other areas are remoter, for instance below the chalk cliffs at Newhaven, Seaford Head, the Seven Sisters or Beachy Head, where there will be a considerable walk in from an access point at low tide. Recreation includes beach walking, sun bathing, picnicking, swimming, leisure fishing and rock pooling on the wave cut platform at low tide.

4.4 Beachy Head East pMCZ

Outline of changes in access

The Beachy Head East pMCZ is between Beachy Head Lighthouse in the west to Hastings Pier in the east. For this stretch of England Coast Path, this section of the trail route follows existing well used clifftop footpaths between Beachy Head and along Eastbourne seafront to the Pier. The coastal margin includes the existing beach access points at Cow Gap and Pinnacle Point. At Eastbourne seafront, there is easy access to the shingle beach and greensand reef at low tide between Holywell and Eastbourne Pier.

Potential for interaction (or lack of it)

The public already generally has access to the shingle beach and inter-tidal area within the coastal margin. However, the Sussex Heritage Coast has high chalk cliffs, so there is access to the beach only at Cow Gap. At low tide there is access to the shingle beach, a raised vegetated shingle bank, greensand reefs at Head Ledge and Falling Sands beach. However this area is relatively remote, with a considerable walk in from Eastbourne seafront or from Beachy Head. At Eastbourne, a major tourist resort, there is easy access to the beach along Eastbourne seafront.

Recreation includes beach walking, sun bathing, picnicking, swimming, leisure fishing and rock pooling on the wave cut platform at low tide.

4.5 Other sites with potential risks to sensitive features

Outline of changes in access

On Brighton Beach there is a small amount of SNCI vegetated shingle on the beach alongside the western Brighton Marina wall, away from the busy beaches. There is an existing interpretation panel here, which features vegetated shingle.

There is also an area of SNCI vegetated shingle within the fenced off area of the Volks railway line, along the Brighton seafront. This is an undisturbed area due to the fencing. This situation is highly unlikely to change as a result of the proposal, especially as railway land is not covered by coastal access rights.

At Tide Mills SNCI, Newhaven there is vegetated shingle along each side of the proposed trail route. This stretch of shingle beach is around Seaford Bay between Newhaven Harbour and Seaford, with the trail located on the landward side of the shingle beach upon an old railway line. The main access points are at Newhaven, from the small car park at Tide Mills and at the western end of Seaford Esplanade. There are several existing interpretation panels, some of which feature the vegetated shingle at Tide Mills.

At the eastern end of the path at Bishopstone there is a caravan park and sailing club, where there is more existing access onto the beach for recreation. The trail is upon a public footpath, a tarmac and gravel path with a wide ex-railway track, located on the landward side of the beach. As the shingle beach is periodically replenished by the Environment Agency, there are marker posts along the crest of the beach with the vegetated shingle on the landward side of the posts. Plant species include Sea Kale, Yellow-horned Poppy and Rock Samphire. See full list of species below.

The trail follows promoted routes along public footpaths.

Potential for interaction (or lack of it)

Low.

The Brighton beach area near the marina is openly accessible but this part has no convenient access, with the landward edges against raised walls. This pattern of use is unlikely to change as a result of coastal access, with limited interaction likely with the vegetated shingle here.

At Tide Mills, there is a locally well used public footpath adjacent to the coast at Seaford Bay between Newhaven and Seaford. There are three access points to this path. Walkers tend to keep to the path, rather than walk upon the loose shingle as it is more difficult to walk on. Within the coastal margin, the vegetated shingle is within a relatively narrow corridor between the path and the crest of the shingle beach. There are marker posts along the crest of the beach. The shingle beach seaward of this is periodically managed by the Environment Agency within the inter-tidal zone, where vegetation is unable to develop. The main flowering season is between spring and summer months. These species are hardy

and prolific during summer months, so it is likely that walkers would tend to walk around the plants rather than upon them.

The East Sussex Shingle Management Plan 2009, states that 'The area exhibits an extremely good example of a vegetated shingle habitat which extends across the entire beach. This fringing beach stretches up to 100m in width and displays a matrix consisting of a mixture of pebbles and gravel. The site is home to a wide variety of shingle plants including Orache (*Atriplex* spp.), Sea-kale (*Crambe maritima*), Sea Beet (*Beta vulgaris*), Bittersweet (*Solanum dulcamara*), Yellow Horned-poppy (*Glaucium flavum*), Buck's-horn Plantain (*Plantago coronopus*), Curled Dock (*Rumex crispus* ssp. *littoreus*), Sea Mayweed (*Tripleurospermum maritimum*), Thrift (*Armeria maritima*), Stonecrop (*Sedum* spp.), Rock Samphire (*Crithmum maritimum*), mosses and grasses, crustose, foliose, and fruticose lichens. Current floral species and distribution indicate the presence of ephemeral, pioneer and established communities. The site also exhibits the presence of a pioneer saltmarsh community.'

Under Management Advice, this 2009 Report states that 'Future maintenance of the site could include some form of permanent demarcation, thereby protecting the site from ongoing recycling activities. Consideration should also be given to limiting public access to sensitive areas of the site and preferred nesting areas. The continued removal of litter and other waste will help to retain the site's environmental value. Interpretation boards can be found on site however additional material could be considered at key access points'. Much of the action identified in this report has been undertaken over the last decade, including new interpretation boards and demarcation, and access is well managed.

5. Assessment of impact-risk and incorporated mitigation measures

In this part of the document we look in more detail at sections of coast where there could be an interaction between the access proposal and sensitive features. We discuss possible risks to sensitive features and explain how these have shaped the design of our proposals and/or led to the inclusion of any specific mitigation measures.

5.1 Brighton to Newhaven Cliffs SSSI

5.1.1 Environmental sensitivity

Brighton to Newhaven Cliffs comprise a 12.5 km (7.5 miles) stretch of coast between Black Rock adjacent to Brighton Marina and Newhaven Fort. They provide superb exposures through the Upper Chalk of the South Downs with a series of vertical chalk cliffs 20-65m high, and the foreshore wave cut platform at the cliff base. Although the main interest of the site is geological, the unimproved grassland of the cliff top and cliff face support rare and uncommon plants and beetles, and the only colony of breeding Kittiwakes in Sussex. It is reported by the RSPB that this colony has relatively recently relocated eastwards to Seaford Head, which is part of the Seaford to Beachy Head SSSI. The Black Rock Raised Beach is an exceptional geological section preserved in the cliffs adjacent to the Undercliff Walk at Brighton Marina. It comprises one of the most extensive sections of ice age geology visible in Northern Europe.

5.1.2 Current access provisions and use of site for recreation

Brighton to Newhaven Cliffs comprises of the length of chalk cliff stretching from Black Rock in the west to Newhaven Fort in the east and includes the wave cut platform at the cliff base. Much of this area has been developed during the mid-20th century upon the top of the cliffs, which includes the A259 coast road and settlements including Roedean, Ovingdean, Rottingdean, Saltdean, Telscombe Cliffs, Peacehaven and Harbour Heights at Newhaven. Due to this development, much of this coastline has been protected by a sea defence at the base of the cliffs, to effectively halt erosion of the cliffs by the sea.

Existing public access includes the Undercliff Walk upon the sea defence and there is a public footpath along the top of the cliffs, with regular access points including steps and ramps which link the cliff top footpath with the Undercliff Walk. At Telscombe Cliffs and Newhaven Cliffs, where there is no development immediately adjacent to the cliffs which requires protecting, there is no sea defence. Therefore for these areas, public access is just along the clifftop public footpath.

This is already an extremely popular area for informal recreation, with both locals and visitors enjoying both the clifftop walks and Undercliff Walk for sea views. There are however some areas considered to be slightly remoter along this coastline, such as Roedean, Telscombe Cliffs and Newhaven Cliffs. Recreational pursuits include walking, dog walking, running, cycling, visiting the beach and cafes. This is particularly prevalent adjacent to the seaside towns at Rottingdean, Saltdean and Peacehaven. Towards Newhaven, there is a country park at Castle Hill Local Nature Reserve (LNR) and Newhaven Fort. Both attract visitors and are owned by Lewes District Council. The Saltdean Trail is a local long distance trail along this section of coast, between Exceat (Cuckmere Haven) and Brighton.



5.1.3 Access proposal

The proposed route for the trail is to use the wide Undercliff Walk at the base of the cliffs between Black Rock and Saltdean. This includes an optional alternative route upon the clifftop public footpath between Roedean and Saltdean. Additional landward coastal margin has been agreed by landowners for the clifftop grassland between the cliff edge and the A259 coast road, where the public already has access, between Black Rock and Telscombe Cliff.

Where the Undercliff Walk finishes at Saltdean, the trail follows the public footpath upon the clifftop to Newhaven. This will have roll back, so that the trail can be relocated inland whenever there is any cliff erosion. As landowners, both Telscombe Town Council and Lewes District Council have agreed to have landward coastal margin for various greenswards adjacent to the trail route, where the public already has access.

Therefore the trail uses existing public access and land within the coastal margin is already accessible for the public.

5.1.4 Predicted change in use of site for recreation

Although this coastline is already well used all year round by both locals and visitors, as a promoted route the trail will undoubtedly encourage walkers to walk the entire length of this section of coast. Therefore some of the perceived quieter sections are likely to have an increase in numbers of visitors. However, as there is already good access to this coastline along existing public footpaths and the Undercliff Walk, it is not predicted that there will be any significant change in the use of the site for recreation.

5.1.5 Possible risks to sensitive features

The sensitive features of the SSSI are focussed upon the cliffs, though they are within the coastal margin there is unlikely to be any change for assess. This is because the chalk cliffs are mostly vertical and due to their crumbly nature, they are not attractive for climbers. As much of this coastline is developed up towards the cliff edge, there is an existing clifftop safety fence along the section of coast between Black Rock and Peacehaven Heights.

The Newhaven Cliffs do not have a clifftop safety fence, as they are not adjacent to properties. Towards Newhaven Fort the cliffs have a less steep, slumping characteristic, so this area is already more accessible between Newhaven Fort and the public car park at West Pier.

The only notified feature liable to disturbance as it is accessible to visitors is the calcareous grassland along the clifftop where it is within the SSSI, particularly between Black Rock and Telscombe Cliff. The clifftop footpath is used for the optional alternative route between Roedean and Saltdean, which is then used for the trail eastwards. As this grassland is already well used and besides the public footpath there are several other informal paths here, it is not predicted that there will be any particular increase in risk of disturbance with coastal access.

Limited areas of vegetated shingle are also found in the coastal margin, but at a significant distance from the clifftop trail. It is not predicted there would be any significant increased risk of trampling in relation to coastal access.

5.1.6 Any mitigation measures included in the access proposal and how they address the possible risks

None are proposed.

5.1.7 Conclusion

There is already well used existing access adjacent to the coast along the Brighton to Newhaven Cliffs SSSI. For much of its length this coastline is developed, with predominantly housing upon the clifftop between Brighton and Peacehaven Heights. The trail uses existing access on the Undercliff Walk and public footpaths upon the clifftop. The coastal margin is for land already accessible to the public, so the 'status quo' is maintained. Other than calcareous grassland and invertebrates, the interest features of the SSSI are birds and geology upon the cliffs. Due to the nature of the cliffs and the existing access to this coastline, it is not predicted that there are any increased risks to the sensitive features.

5.2 Seaford to Beachy Head SSSI

5.2.1 Environmental sensitivity

The Seaford to Beachy Head SSSI comprise approximately 14 km (9 miles) stretch of coast where the South Downs meet the sea between Seaford and Eastbourne. The interest features include herb-rich chalk grassland, rare chalk heath, maritime grassland, beach and chalk cliff. The cliffs, the wave cut platform at the cliff base and the Greensand reef are of geological and marine interest. The meanders of the Cuckmere Estuary are of geomorphological importance. The site supports nationally rare, nationally scarce and nationally significant plants, invertebrates and birds. Vegetated shingle, which is recorded as a priority habitat under the UK's Biodiversity Action Plan (BAP), is present within the coastal margin at Cuckmere Haven, Cow Gap and Holywell.

5.2.2 Current access provisions and use of site for recreation

The East Sussex Heritage Coast area between Seaford and Eastbourne is already extremely popular with locals and visitors. The internationally renowned coastline features the iconic Seven Sisters chalk cliffs, with several 'honeypot' destinations including Seven Sisters Country Park, Cuckmere Haven, Birling Gap and Beachy Head.

The footpath section of the South Downs Way National Trail runs along the clifftop between Exceat and Eastbourne. A section of the Vanguard Way and Seahaven Coastal Trail also runs along the coast between Exceat and Newhaven via Seaford Head.

Seaford Head LNR has open access land. The Seven Sisters Country Park including Cuckmere Haven is open access land under CROW. Much of the National Trust land upon the Seven Sisters coastline at

Gayles, Crowlink, Birling Gap and Belle Tout is also open access. The Eastbourne Downland between Belle Tout and Eastbourne has a wide area of open access land along the coast under CRoW.

There are car parks close to or at the coast including Seaford Seafront, South Hill Barn on Seaford Head, Exceat, Crowlink, Birling Gap and along the coast road at Beachy Head. Parking is also available at Dukes Drive and seafront at Eastbourne. There are visitor centres at Exceat, Birling Gap and Beachy Head. Refreshments are available at Seaford Golf Clubhouse (The View), Exceat, Birling Gap, Beachy Head and at Dukes Drive, Eastbourne.

In summary, the Heritage Coast has generally a wide area of existing open access land along the cliff top. The area is primarily used for walking, dog walking, sightseeing, photography, cycling, picnicking, bird watching, nature study, rock pooling, sun bathing, swimming, paddle boarding and surfing.

5.2.3 Access proposal

From west to east, the proposed trail route follows the public footpath from the end of Seaford promenade onto Seaford Head clifftop. This is already used by the Vanguard Way and the Seahaven Coastal Trail. At Cuckmere Haven the trail follows the western edge of the Estuary along a public footpath to the first river crossing point at Exceat Bridge. Here it joins a roadside path adjacent to the A259 coast road across the estuary. At Exceat, the trail then joins the South Downs Way National Trail upon the South Downs to Eastbourne. Both trails return to the clifftop at Cliff End for the Seven Sisters, Birling Gap, Belle Tout, Beachy Head and Cow Gap to Eastbourne seafront.

There are a couple of variations proposed for the existing route of the South Downs Way, after the England Coast Path is established. Firstly at Birling Gap, both trails will go around the busy car park via the cliff top viewing platform, then directly ascend Belle Tout via steps adjacent to the Coastguard Cottages. Secondly, between Beachy Head and Eastbourne, both trails will take a more southerly line towards the coast, using clifftop footpaths around the lower slopes area to Dukes Drive. The trails will use existing public footpaths and walked routes via Frances Bottom, Cow Gap, Whitebread Hole and above Foyle Way to Dukes Drive. This existing popular route is already used by the Wealdway long distance footpath.

A Section 25A access exclusion is proposed for the saltmarsh habitat at Cuckmere Haven, as it is considered unsuitable for public access (See Map E in the main report).

5.2.4 Predicted change in use of site for recreation

The East Sussex Heritage Coast is already internationally renowned, primarily for its iconic chalk cliffs between the Seven Sisters and Beachy Head and quintessentially English landscape. The coast is heavily walked all year round and already has the South Downs Way footpath upon the clifftop between Exceat and Eastbourne seafront, via the Seven Sisters and Beachy Head. Seaford Head has the Vanguard Way and Seahaven Trail regional long distance trails. Land within the proposed coastal margin is already open access. The England Coast Path trail will follow these existing trails using public footpaths and as a promoted route it should assist with connecting this popular area with the wider coastline.

Much of the clifftop is already open access land under CRoW. As the area is already heavily used and the trail follows existing public footpaths including the South Downs Way National Trail, there is little or no predicted change in the use of the site for recreation.

5.2.5 Possible risks to sensitive features

At Seaford Head there is an isolated colony of Kittiwakes nesting upon the cliffs. Peregrines and Ravens are known to use the cliffs generally along this coastline. The area is renowned for its calcareous grassland. The population of the Schedule 8 plant - Early Spider-orchid is found well inland of the trail on existing open access land at Belle Tout.

With regard to non-breeding birds, the trail follows the existing South Downs Way and Vanguard Way. Between Beachy Head and Dukes Drive in Eastbourne, where the trail is proposed to be on paths along the clifftop seaward of the existing South Downs Way, this is already an extremely popular walking route. No concerns have been raised regarding any disturbance for non-breeding birds.

The population of Schedule 8 plant - Small Hare's-ear is a small umbellifer reaching 3cm high at most with minute yellow flowers, located on very short coastal turf upon the cliff edge at Beachy Head, away from the line of the trail. Trampling from the coast path is therefore not considered an issue for these species.

Populations of nationally scarce butterfly species - Adonis Blue. The only possible risk is trampling of its food plant, Horseshoe Vetch, however this plant is in places plentiful upon the downs away from the cliff edge and main walking route, so trampling is not considered an issue.

At Cuckmere Haven there is vegetated shingle, recorded as a priority habitat under the UK's Biodiversity Action Plan (BAP). The East Sussex Vegetated Shingle Management Plan 2009 considers that 'Despite a large tourist presence within the park, the beach is relatively undisturbed and in good condition'. The Management advice is 'Management of the site is already of a very high standard. Restricting access to sensitive areas of the site may benefit some floral species and encourage ground nesting birds. The continuation of regular ecological surveys and general site monitoring is advisable here.' There are also small areas of vegetated shingle at Cow Gap and Holywell, at the far western end of Eastbourne Beach.

Additional trampling is not considered a significant risk in this well managed area.

5.2.6 Any mitigation measures included in the access proposal and how they address the possible risks

No mitigation measures are considered necessary. However, the RSPB requested signage of the Kittiwakes colony at Seaford Head, to increase public awareness and appreciation of them.

As part of the England Coast Path proposals, a new interpretation board will be provided near the car park, west of Seaford Head, from where the birds can best be viewed. Seaford Town Council has offered to maintain the interpretation board in the future.

The Sussex Heritage Coast Partnership is currently having a review of interpretation for this section of coastline to provide a uniformity of approach. Natural England will liaise with them over the design and content of the interpretation board.

5.2.7 Conclusion

In summary, for the Seaford to Beachy Head SSSI the trail closely follows the coast via Cuckmere Haven, using existing public footpaths which are already used by long distance trails. The whole coastline here is considered to be an internationally famous 'honeypot' site for both locals and tourists due to the iconic South Downs chalk cliffs and Cuckmere's relic meanders. The area is already well managed as a quintessentially English landscape.

Land within the coastal margin is generally existing open access land, with additional land requested for inclusion as landward coastal margin by the National Trust upon the Seven Sisters at Gayles and Crowlink and by Eastbourne Borough Council for the Eastbourne Downland. As the chalk cliffs are unprotected by sea defences, the trail along this coastline will have roll back.

5.3 Beachy Head West MCZ

5.3.1 Environmental sensitivity

The Beachy Head West Marine Conservation Zone is located offshore parallel to the East Sussex coastline between Brighton Marina in the west to Beachy Head Lighthouse in the east. There is a break in the MCZ designation for the entrance to Newhaven Harbour. The purpose of MCZs is to protect the full range of nationally important marine wildlife, geology and geomorphology. The intertidal section of the chalk wave-cut platform is particularly important for marine wildlife.

5.3.2 Current access provisions and use of site for recreation

There is already good existing access along this section of coastline, including the Undercliff Walk between Brighton Marina and Saltdean and also at Peacehaven. There are cliff-top footpaths between Black Rock and Newhaven Harbour and an ex-railway path adjacent to the shingle beach between Newhaven Harbour and Seaford Esplanade. There is a cliff-top footpath along the East Sussex Heritage Coast between Seaford Head and Beachy Head, used by The South Downs Way and Vanguard Way long distance trails.

There are beach access points at various locations, mostly linked to settlements adjacent to the coast, which include Rottingdean, Saltdean, Newhaven, Tide Mills and Seaford. There are also steps from the cliff-top down to the beach at Ovingdean and Peacehaven. Along the Sussex Heritage Coast there are beach access points at Hope Gap, Cuckmere Haven and Birling Gap. These are already 'honeypot' sites for both locals and tourists to view the iconic chalk cliffs of the Seven Sisters and Beachy Head.

The shingle beach is used for walking, sun bathing, picnicking, swimming, recreational fishing, wildlife watching, canoeing and paddle boarding. At low tide, rock pooling may take place on the wave-cut platform, particularly at Hope Gap and Birling Gap. During high tide and stormy seas, surf boarding may take place at Birling Gap.

5.3.3 Access proposal

The trail uses existing access along this section of coastline, including the Undercliff Walk between Brighton Marina and Saltdean and cliff-top footpaths, with the seaward coastal margin to mean low tide.

5.3.4 Predicted change in use of site for recreation

As the area is already heavily used and the trail follows existing paths including the South Downs Way National Trail, there is little or no predicted change in the use of the MCZ for recreation.

5.3.5 Possible risks to sensitive features

There are no predicted risks to the sensitive features of the MCZ due to Coastal Access proposed for this section of coast between Brighton Marina and Beachy Head.

5.3.6 Any mitigation measures included in the access proposal and how they address the possible risks

None are proposed.

Opportunities to enhance public understanding of the MCZ features has been explored as part of the ECP proposal, however new interpretation along the Brighton to Saltdean undercliff is already in development, with external funding being sought during Autumn 2018. If this funding is not forthcoming, the England Coast Path would look to support The Living Coast project with creation of new signs, prior to the trail opening, to increase awareness of the coastal habitats.

5.3.7 Conclusion

As the area is already heavily used and the trail follows existing paths including the South Downs Way National Trail, there is little or no predicted change in the use of the MCZ for recreation.

5.4 Beachy Head East pMCZ

5.2.1 Environmental sensitivity

The Beachy Head East pMCZ is located offshore parallel to the East Sussex coastline between Beachy Head Lighthouse in the west to Hastings Pier in the east. For this stretch of England Coast Path, this section of the trail route follows existing well used clifftop footpaths between Beachy Head and along Eastbourne seafront to the Pier. The purpose of MCZs is to protect the full range of nationally important marine wildlife, geology and geomorphology. The intertidal section of the chalk wave-cut platform is particularly important for marine wildlife.

5.2.2 Current access provisions and use of site for recreation

Along the Sussex Heritage Coast between Beachy Head and Holywell, the main access point to the beach is at Cow Gap. Though this access point is relatively remote, it provides access to the shingle beach, a small area of vegetated shingle, greensand reefs, Falling Sands and Lighthouse at a dramatic setting below Beachy Head. It is also possible to walk between Eastbourne Seafront and Cow Gap at low tide. The main recreation uses are walking, picnicking, rock pooling and recreation on Falling Sands beach. Along Eastbourne seafront, there is good access from the promenade to the shingle beach for recreation, which includes rock pooling on the Greensand reefs between Holywell and the Wish Tower at low tide.

5.2.3 Access proposal

The trail route follows existing clifftop footpaths between Beachy Head and Eastbourne seafront. The coastal margin includes beach access points at Cow Gap, Pinnacle Point and Eastbourne beach between Holywell and Eastbourne Pier.

5.2.4 Predicted change in use of site for recreation

There is no predicted change in the use of the pMCZ between Beachy head Lighthouse and Eastbourne Pier for recreation.

5.2.5 Possible risks to sensitive features

There are no predicted risks to the sensitive features of the pMCZ due to Coastal Access along this section of coast.

5.2.6 Any mitigation measures included in the access proposal and how they address the possible risks

None are proposed.

5.2.7 Conclusion

The proposed line of both the England Coast Path and the South Downs Way are to be located on the well-used clifftop path around the lower slopes area between Beachy Head and Holywell via the beach access at Cow Gap. Eastbourne seafront is already an extremely well-used area. Therefore there is little or no predicted change in the use of the pMCZ for recreation.

5.5 Other sites with potential risks to sensitive features

5.5.1 Other sites with potential risks to sensitive features

At Brighton, there are some areas of vegetated shingle west of the marina and along the Volks railway line. The marina beach is a quiet and relatively undisturbed part of a busy, tourist beach, separated from the main thoroughfares by walls. Changes in patterns of use are unlikely here. Along Volks railway, the vegetated shingle is protected by fencing.

At Tide Mills there is vegetated shingle along each side of the trail which is included in a Site of Nature Conservation Importance (SNCI). This is a long stretch of shingle beach around Seaford Bay between Newhaven Harbour and Seaford, with the main access points at Newhaven, from the small car park at Tide Mills and at the western end of Seaford Esplanade. The trail is upon a wide ex-railway track, which is a surfaced tarmac and gravel path on the landward side of the beach. Walkers tend to keep to the path, rather than walk upon the loose shingle as it is more difficult to walk on. Some areas are therefore more remote away from the three access points. Towards Seaford esplanade at Bishopstone there is a caravan park and sailing club, so that the beach here is more heavily used here than elsewhere around Seaford Bay.

Plant species include Sea Kale and Rock Samphire. These species are hardy and prolific during summer months, so walkers would tend to walk around the plants rather than upon them. There are marker

posts along the crest of the beach with the vegetated shingle on the landward side of the posts. The Environment Agency periodically replenishes the shingle beach to the seaward side of the marker posts.

5.5.2 Any mitigation measures included in the access proposal and how they address the possible risks

None proposed.

The East Sussex Vegetated Shingle Management Plan 2009 proposes on-site interpretation of the vegetated shingle habitat, so that visitors are more aware of the vulnerable nature of the plant species and to avoid causing any damage to them. Since 2009, more interpretation has been provided and access and shingle management demarcation has been improved.

6. Conclusions

6.1 Overall conclusion - SSSI

In the light of this appraisal, Natural England has concluded that the new access proposal:

complies with Natural England's duty to further the conservation and enhancement of the notified features of the SSSI, consistent with the proper exercise of its functions¹ - and accordingly the new access proposal may proceed as finally specified in this template

OR

would not comply with the duty referred to in (a) – and accordingly permission/ authorisation/ assent should not be given for the new access proposal in the form finally specified in this template, for the following reasons:

6.2 Overall conclusion: Marine Conservation Zone

In respect of any duties that may arise under section 125 of the Marine and Coastal Access Act 2009, Natural England has concluded for Beachy Head West MCZ and Beachy Head East pMCZ that:

The access proposal (including any mitigation measures specified in this appraisal) is the one that, consistently with the proper exercise of its functions under section 296 of the same Act, is least likely to hinder the achievement of the conservation objectives for the Marine Conservation Zone - and accordingly may proceed

OR

The above test is not met, and accordingly the access proposal should not be taken forward in this form, for the following reasons:

6.3 Other features about which concerns have been expressed

In the light of this appraisal, Natural England has concluded that:

the appropriate balance has been struck by the new access proposal between NE's conservation and access objectives, duties and purposes - and accordingly the new access proposal should proceed as finally specified in this template

OR

¹ The reference in 7.2 above to Natural England's functions includes its balanced general purposes for access, nature conservation and landscape under the NERC Act 2006, any specific statutory duties it may have to deliver specific improvements to public access, and the access-related policies and priorities it periodically agrees with Defra.

the appropriate balance referred to above has not been struck – and accordingly the new access proposal should not proceed in the form finally specified in this template, for the following reasons:

6.4 Certification

6.1.4 Certification – access proposal

I agree with the conclusions of this appraisal and am satisfied that the final access proposal, incorporating any mitigation measures, is the least restrictive option necessary to ensure appropriate protection of sensitive features.

Signed:



Name: Jenny Bowen, Senior Adviser
England Coast Path (South East)

Date: 030918

6.2.4 Certification – environmental impacts

I agree with the conclusions of this appraisal and am satisfied that potential environmental impacts of the access proposal on Brighton to Newhaven Cliffs SSSI and Seaford to Beachy Head SSSO have been fully addressed.

Name: Kristoffer Hewitt, Senior Adviser
Conservation Delivery, Sussex & Kent

Signed:



Date: 030918

7. Establishing and maintaining the England Coast Path

In this part of the document we describe how the access proposal would be implemented and arrangements for ongoing management and maintenance once coastal access rights are in place.

Note that before the access proposal can be taken forward, the coastal access report must first be considered by the Secretary of State in light of any representations, any objections from affected owners or occupiers and the Appointed Person's recommendations as to how any objections should be determined.

7.1 Establishment

7.1.1 Works on the ground

Once approval for a coastal access report is received from the Secretary of State, any necessary works can be carried out on the ground to make the trail fit for use and prepare for opening. In this case, works on the ground would be carried out by four access authorities. These are West Sussex County Council, Brighton & Hove City Council, East Sussex County Council and the South Downs National Park Authority.

An estimate of the total cost of works needed to establish the trail is given in our coastal access report for the stretch. The cost of establishment works will be met by Natural England.

West Sussex County Council, Brighton & Hove City Council, East Sussex County Council and the South Downs National Park Authority are responsible for ensuring they take appropriate steps to protect sensitive features whilst works on the ground are carried out, in line with any recommendations or conditions agreed in advance.

We have held preliminary discussions with West Sussex County Council, Brighton & Hove City Council, East Sussex County Council and the South Downs National Park Authority about the works required and believe that it is feasible for them to be carried out without adverse effect on the designated sites considered in this appraisal.

West Sussex County Council, Brighton & Hove City Council, East Sussex County Council and the South Downs National Park Authority will instigate the SSSI assent process by writing to us to confirm the timing of works and how operations to be undertaken in line with these conditions. Natural England will provide further advice as necessary.

7.2.1 Implementation of incorporated mitigation measures including local restrictions or exclusions

The mitigation measures described in Part 5 of this document will be implemented as follows:

| Measure | Implementation |
|--|---|
| 5.2.6 No mitigation measures – but new interpretation of kittiwakes at | An interpretation panel would be designed and installed near the car park, west of Seaford Head, with input from the Sussex |

| | |
|--|--|
| the car park below Seaford Head, to raise awareness of this unique population. | Heritage Coast, South Downs National Park, RSPB and Seaford Town Council |
| 5.3.6 No mitigation measures – but new interpretation of MCZ features along the Brighton to Saltdean undercliff, if current funding bid is unsuccessful. | Interpretation would be designed and installed along the undercliff, with the assistance of The Living Coast Project and Brighton and Hove City Council. |

Where specific restrictions or exclusions have been included in the proposal in order to avoid the risk of any potential significant effects and are approved by the Secretary of State, Natural England will give the necessary directions before public rights come into force to make the rights subject to those restrictions or exclusions.

7.2 Maintenance

Where there is a need for ongoing maintenance of any special measures proposed, this will become part of longer term arrangements for upkeep of the trail. An overall estimate of the ongoing cost of maintaining stretches of the England Coast Path is given in the relevant part of our report for the stretch.

7.3 Monitoring

Monitoring of the protected site will continue through established programmes including our common standards monitoring protocols. The access authority will be responsible for ongoing monitoring of trail condition. Natural England will be tracking general trends, including in the number of people using the path, as part of our evaluation of the coastal access programme nationally.

7.4 Future changes

The access proposals in this document are designed to ensure appropriate protection of sensitive features, taking account of any mitigation measures that are included. The coast is a dynamic environment and in designing the access proposals we have taken account of any changes predicted by the Environment Agency as a result of coastal erosion or other geomorphological processes. Should it be necessary in the future to identify a new alignment for the trail in line with ‘roll back’ proposals in the stretch report, due care will be taken at that stage to minimise any potential impacts of this change on sensitive features. The same will be true if any unforeseen other changes arise in the future that may require us to propose a variation of the access arrangements described in these proposals, following due procedures.

8. References

1. NATURAL ENGLAND. 2013. Coastal Access Natural England's Approved Scheme 2013. Published by Natural England Catalogue Code: NE446
<http://publications.naturalengland.org.uk/publication/5327964912746496?category=50007>
2. East Sussex County Council. 2009. East Sussex Vegetated Shingle Management Plan 2009. T. Smith
3. Sussex Ornithological Report (2016).

Enquiries about the proposals should be addressed to:

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