

**DRAFT**

Bexhill-on-Sea Town Council  
35 Western Road  
Bexhill-on-Sea  
East Sussex  
TN40 1DU

27<sup>th</sup> March 2024

The Right Honourable Steve Barclay MP  
The Secretary of State for Environment, Food and Rural Affairs  
Parliamentary Office  
House of Commons  
London SW1A 0AA

Dear Secretary of State

**URGENT HELP REQUIRED FOR THE EXTENSION OF A SITE OF  
SPECIAL SCIENTIFIC INTEREST (SSSI) TO INCLUDE  
GALLEY HILL VEGETATED BEACH AND CLIFFS  
ON THE BEXHILL-ON-SEA AND HASTINGS MARINE BOUNDARY**

**Introduction**

Bexhill Town Council is directly involved in the conservation of its landscape. Bexhill-on-Sea has within its nine Wards three Sites of Special Scientific Interest (SSSI): Eastern Pevensey Marshes, the whole of Highwoods Ancient Woodland and two-thirds of the Combe Haven Valley. It also has areas of registered ancient woodland at Cooden, Gillham Wood and Collington Wood that are not yet SSSIs, as well as key areas of coastal beach and cliffs.

Bexhill Town Council, Rother District Council, Hastings Borough Council and East Sussex County Council have all agreed that the area of Combe Valley be kept as a 'green space' between the towns of Bexhill-on-Sea and Hastings & St Leonards.

Combe Valley (owned by a range of councils and landowners) and Filsham Reed Beds (owned by Hastings Borough Council and managed by Sussex Wildlife Trust (SWT)) are enclosed within the Combe Haven Countryside Park (CVCP) which is controlled by the Combe Haven Countryside Park Community Interest Company (CIC) and managed by its agent Groundwork South. However, the wildlife and landscape-rich area of Galley Hill is inside the CVCP, yet outside the Combe Haven SSSI. This key area of cliff and beach lands needs to be included within the SSSI to protect the rare bees, migratory birds, and many other wildlife assets.

However, Natural England has still failed to respond to a request for assistance in extending the SSSI within the CVCP to cover Galley Hill.

### **How Bexhill Town Council is Involved**

The Council knows that the SSSI areas inside its boundaries are legally protected under the *Wildlife and Countryside Act 1981* which gives Natural England powers to ensure the protection and future safeguarding of SSSIs – the nation's very best wildlife and geological sites. Natural England's public statement include its intention to 'ensure favourable condition' status for all SSSIs 'through appropriate management'.

Bexhill Town Council takes part in the government's conservation and biodiversity strategies through a Project Manager, who is directly involved in the Local Nature Recovery Strategies (LNRS)<sup>1</sup> directed by Dr Kate Cole, the East Sussex County Council Ecologist. This is a government-generated initiative made even more urgent by the adverse trends for biodiversity set out in the comprehensive review - the 2023 *State of Nature Report*<sup>2</sup>. The conservation of Galley Hill is one of the main Town Council targets for the government's initiatives in the Department for Environment, Food and Rural Affairs 30-by-30 Plan<sup>3</sup>. Galley Hill cliff and beach area is marked on the government's 'Magic' conservation site<sup>4</sup> which shows all the areas that the government wishes to protect. It is also part of the 30-by-30 Plan activity shown on the government's detailed map for Bexhill<sup>2</sup>.

### **What has gone wrong?**

The Town Council's Project Manager has been photographing Combe Valley and Galley Hill wildlife since 2013. All sightings have been logged on Sussex iRecord, part of the National Biodiversity Network database. Rother District Council has previously planned to put a set of 20 beach huts directly below the Galley Hill Cliffs and this was concerning (see wildlife at risk in the appendix to this letter).

The Town Council's Project Manager understood that the Natural England processes for a completely new SSSI and an existing SSSI boundary extension had very different timescales. The Rother District Council ecologist, Dr Lucie Bolton was consulted, and she confirmed that it would be far faster to get Galley Hill protected if it was to be treated as integral to Combe Valley SSSI with an extension, rather than to wait years for Galley Hill alone to be made a separate SSSI. After all, the categorisation of Filsham Red Beds is integral within Combe Haven SSSI and is not a separate SSSI.

It is vital to extend the SSSI from Combe Valley to cover Galley Hill in line with government guidance set out in the references below. Therefore, on 1st September 2023 the Town Council's Project Manager telephoned Natural England HQ at Bristol to ask for advice about a SSSI extension and was told to email 'protected sites@naturalengland'.

A comprehensive email was sent at 15.32 that day, asking for help in extending the existing SSSI to cover Galley Hill and listing all the key wildlife with accompanying photographs (see below).

Instead of replying with help and advice, Natural England gave a Case Reference of 0409230824JT yet failed to take any notice of the text of the email sent to them. They (Elliott Petkovic – Advisor Farm and Conservation Service) replied saying it would take 'possibly many years' to set up a completely new site, and detailing the extensive fees to be charged if a completely new site was required to be made a SSSI quite quickly.

Realising that the Natural England staff member had failed to read the key part of the Project Manager's email, the Project Manager then talked to Bristol again and was advised to email Sussex and Kent CDT – a part of Natural England. Once again, an email was sent on 4<sup>th</sup> September 2023 at 11.24. The email set out everything that was wished for in detail. No reply was ever received, and the email was never acknowledged by Natural England.

Given the parlous reaction of the various components of Natural England, including oversights and their lack of professionalism, Bexhill Town Council now respectfully requests that the Secretary of State intervenes directly and guides Natural England to treat Bexhill Town Council's request for an SSSI **extension** to cover Galley Hill seriously and urgently.

Sussex Wildlife Trust (SWT) was consulted and a senior officer who had been the land manager for SWT for eleven years replied that an extension would be 'amazing'.

James Power, author of *The Bees of Sussex* (2024), who was a member of DEFRA and lectures at Rye Harbour Nature Reserve has also commented to the Town Council's Project Manager via SWT WildCall on 11<sup>th</sup> March 2024 at 12.26 on the Galley Hill rare bees and their cleptoparasites as follows:

"The cliffs – and vegetated shingle - at Galley Hill are **very rich for aculeates** and **an extension of the SSSI to cover this area would be amazing**. One additional species that can be added to the list in the email below is **Andrena vaga**, which is known from just two locations in Sussex (the other being Rye Harbour Nature Reserve). It nests in a small area of cliff at Galley Hill – the colony is tiny.

"Melecta albifrons is definitely not a cuckoo of **Colletes cunicularius** but is a cuckoo of Anthophora plumipes which does also nest in the cliffs at Galley Hill, often in the same area of cliff – hence the possible confusion. There is a cuckoo on the Colletes, but it hasn't been recorded in Sussex yet. This bee, **Sphecodes albilabris**, could well turn up in the near future given how widely the Colletes is now."

The appendix attached to this letter sets out the wildlife and landscape to be urgently conserved.

Yours faithfully

Julie Miller

Town Clerk to Bexhill-on-Sea Town Council

### **References**

1. [Local nature recovery strategies: areas and responsible authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/local-nature-recovery-strategies-areas-and-responsible-authorities)
2. [State of Nature 2023 - report on the UK's current biodiversity](https://www.gov.uk/government/publications/state-of-nature-2023-report-on-the-uk-s-current-biodiversity)
3. [Delivering 30by30 on land in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/delivering-30by30-on-land-in-england)
4. [MAGIC \(defra.gov.uk\)](https://defra.gov.uk/magic)

**Appendix:** The Wildlife and Landscape of Galley Hill, Bexhill, East Sussex

## Appendix

### The Wildlife and Landscape of Galley Hill, Bexhill-on-Sea, East Sussex

#### Introduction

The long line of Berriasian-Valanginian sandstone cliffs at Galley Hill date to 140-180 million years old in the Lower Cretaceous. The wavecut platform seen at low tide contains the footprints of the Iguanodon dinosaur. There is an ancient forest remnant gradually turning to stone. The shingle has turned into a fine vegetative beach pavement habitat with Sea-kale (*Crambe maritima*) beds and Yellow Horned-poppy (*Glaucium flavum*). The cliffs have many thousands of small holes cut by mining bees. Some of these bees are very rare. The location is also an insect hunting ground for the migratory ground nesting Northern Wheatear bird from Kenya and Senegal. Other birds include types of gulls, a large flock of some 280 Turnstones (migratory to Greenland), many Oystercatchers and around 80 Cormorants. The beach is now frequently visited by Seals. As well as the Silver Y moth, there is evidence of the Six-belted Clearwing Moth. The Green Tiger Beetle lives and mates here, as does the Pill Millipede.

#### **Known Rare Bees mining at Galley Hill requiring urgent conservation status**

Early Colletes (*Colletes cunicularius*)

Grey-backed Mining Bee (*Andrena vaga*). This was previously thought to be extinct in Britain.

#### **Other bees mining the cliffs**

Gwynne's Mining Bee (*Andrena bicolor*)

Yellow-legged Mining Bee (*Andrena flavipes*)

Cliff Mining Bee (*Andrena thoracica*) (local cliffs are only last refuge of this bee in Sussex)

Hairy-footed Flower Bee (*Anthophora plumipes*)

Silvery Leafcutter Bee (*Megachile leachella*)

The Mourning Cleptoparasitic bee (*Melecta albifrons*)

Spined Mason Bee (*Osmia spinulosa*)

Buffish Mining Bee (*Andrena nigroaenea*)

Trimmer's Mining Bee (*Andrena trimmerana*)

Hairy Yellow-face Bee (*Hylaeus hyalinatus*)

NB: The secret of Galley Hill is that although its cliffs are generally barren in their upper and mid-sections apart from the foreign incursive but usefully rock-binding Hottentot Fig (*Carboprotus edulis*), the lower levels contain many plants sought out by bees and the whole of the top of Galley Hill is a clover-rich lawn of good moist grass for many months with many flowers.

The proximity of the flowered grass to the soft sandstone bee-mining potential is key.

### **Migratory birds**

Northern Wheatear (*Oenanthe Oenanthe*) (very scarce in Sussex) but recorded each year at Galley Hill.

Ruddy Turnstone (*Arenaria interpres* – variety (Linnaeus, 1758)

### **Other birds**

Great Cormorant (*Phalacrocorax carbo*)

Eurasian Oystercatcher (*Haematopus ostralegus*)

Goldfinch (*Carduelis carduelis*)

Herring Gull (*Larus argentatus*)

Black-headed gull (*Chroicocephalus ridibundus*)

Great Black-backed gull (*Larus marinus*)

### **Significant insects**

Green Tiger Beetle (*Cincindela campestris*) breeding

Pill millipede (*Clomeris marginata*)

### **Significant moths**

Six-belted Clearwing (*Bembecia ichneumoniformis*) – nationally scarce

Silver Y (*Autographa gamma*) not rare but is migratory

### **Mammal**

Common Harbour Seal (*Phoca vitulina*) – less common than the Grey Seal

### **Considerations**

When the SSSI Extension is made then the South Coast Cycle Way and the South Coast Footpath could be routed and signposted over Galley Hill on the existing hard surfaced path from Glyne Gap to Bexhill-on-Sea seafront, rather than on the beach level footpath so close to sensitive wildlife areas.

### **Appendix References**

Barnard, P. *The Royal Entomological Society Book of British Insects* (2011) Chichester, Wiley-Blackwell.

Hume, R. *RSPB Guide to the Birds of Britain & Europe* (2014) London, Dorling-Kindersley.

Power, J. *The Bees of Sussex* (2024) Newbury, Pisces Publications.

Sterry, P. and Cleave, A. *Collins Complete Guide to British Coastal Wildlife* (2012) London, Harper Collins.

Waring, P. and Townsend, M. *Field Guide to the Moths of Great Britain & Ireland* (2017) London, Bloomsbury.

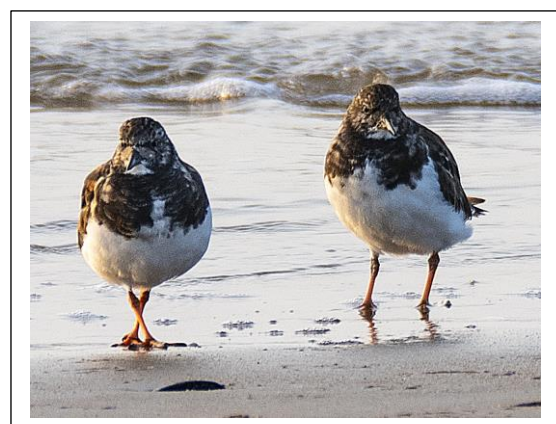




Galley Hill vegetated beach



Yellow horned-poppy



Turnstones



Migratory Northern Wheatear on Sea-kale



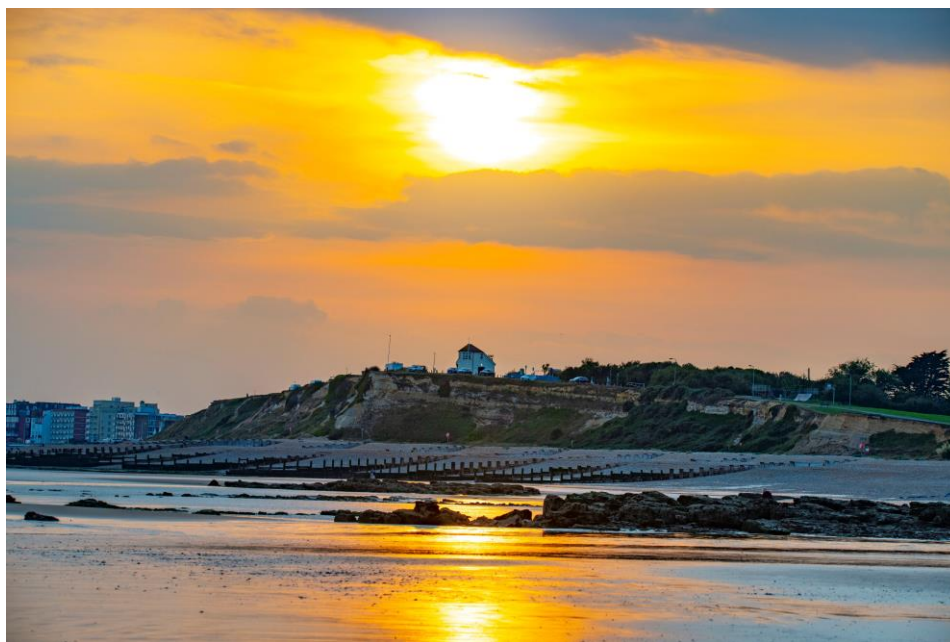


Galley Hill cliffs offer a wide range of habitats for birds and mining bees.



Above: Northern Wheatear

Left: First section of Galley Hill Cliffs







Left: Green Tiger Beetle

Above: Cleptoparasitic Melecta Albifrons – The Mourning Bee



Green Tiger Beetles mating



Key habitats at Galley Hill



Hairy-footed Flower Bee



The rare Early Colletes Bee