Position statement in regards to a rock revetment at east beach 14/3/2017
This position statement is given in response to a paper circulated by members of the Sidmouth BMP steering group on 5th March 2017 and the questions therein

Context

A joint position statement regarding interim works at East Beach, Sidmouth was submitted to the Steering Group in May 2016 and our support for that statement is unchanged.
In 2011 a planning application for a rock revetment along East Beach was withdrawn prior to being refused permission. The reasons for that decision and the environmental constraints described by Natural England, the World Heritage Team and the East Devon AONB team still apply in principle. The decision by EDDC can be reviewed on the East Devon planning portal (planning application 11/0904/FUL).
The following information is intended to provide guidance to the Sidmouth Beach Management Plan Steering Group in reference to the various questions that have been raised about the environmental constraints, specifically issues B, C and E.

Response to questions

Issue B: *Why preserve the exposure of geology/fossils on East Beach if it is unsafe to go there?*
The role of the Jurassic Coast, Natural England and the East Devon AONB teams is to represent the conservation interests of the site. We are not able to make decisions regarding beach safety. The comments below follow observations made during the development of a rock fall and landslide protocol by Dorset County Council.
The rock falls of the type seen along East Cliff, Sidmouth are totally unpredictable, meaning at any time the baseline risk includes the danger of death. This applies to any location along the World Heritage Site (WHS) where sudden rock falls occur.
However, beaches remain open access in spite of ongoing risks posed by the processes of erosion and from the sea. For example, in August 2016 there were three large rock falls at West Bay within a three week period. Hundreds of people were on the beach during these event and thankfully no one was hurt. Regardless of the clear risk to life the beach was not closed. A key reason for this is that only the police have the legal power to close beaches to the public, and they will only do so during an emergency. Dorset County Council may be able to provide further advice to East Devon District Council based on their rock fall and landslide protocol.
East Beach remains open access and a viable research site in spite of the ongoing risks posed by rock falls. Geologists and those wishing to study such areas are generally well aware of the risks and will carry out risk assessments and wear appropriate safety equipment when required.

Issue B: *Why preserve the exposure of geology/fossils on East Beach if exactly the same geology/fossils are exposed in the cliffs behind Jacobs Beach?*

Similar strata to those exposed at East Cliff are indeed exposed to the west of Sidmouth, below High Peak. However, preserving a range of exposures where scientifically important data can be collected is preferable and allows for better correlation and resolution.

Of the two complimentary exposures, East Cliff contains the superior geological record of the boundary between the Otter Sandstone Formation and Mercia Mudstone Group. The East Cliff section provides key evidence for the environmental transition between the two rock units and is also known to yield a particularly diverse fauna of fossils. The scientific value of the Otter Sandstone is described in the Geological Conservation Review volumes 10 and 24. The significance of the East Cliff section within the context of the overall exposure of Otter Sandstone is described in Gallois, R. W. 2004. *The type section of the junction of the Otter Sandstone Formation and the Mercia Mudstone Group (mid Triassic) at Pennington Point, Sidmouth*. Geoscience in south-west England, **11**, 51-58.

In spite of the significance of this location to the OUV of the WHS we have accepted the need for compromise to allow a reduction in erosion rates along East Beach and are willing to support a design that mitigates negative impacts on the scientific interest and that is sympathetic to natural processes and visual impact issues. Such mitigation is in line with the Dorset and East Devon Coast World Heritage Site management plan 2014 - 2019, which East Devon District Council has endorsed.

Relevant policies:

1.1 Protect the Outstanding Universal Value (OUV) of the Site through prevention of developments that might impede natural processes, or obscure the exposed geology, as set out in the GCR / SSSI details, now and in the future.

1.2 Where developments affecting the Site or setting do take place, avoid or at least mitigate negative impact on the natural processes of erosion and exposed geology.

1.4 Protect the landscape character, natural beauty and cultural heritage of the Site and setting from inappropriate development.

Issue C: *What weight was given to maintaining the exposure of the geology on East Beach when considering the options?*

The scientific significance of the geological exposures at East Cliff is detailed above. The value of exceptional geodiversity is the basis for The World Heritage Status of the Dorset and East Devon Coast and the source of its Outstanding Universal Value (OUV).

National Planning Policy Framework (NPPF) is clear that 'great weight' should be given to the protection of designated areas such as World Heritage Sites and AONBs (NPPF paragraphs 115 and 132) and states that *"The more important the asset, the greater the weight should be".* World Heritage Status is the highest possible level of designated heritage asset.

Protection for the 'setting' of the WHS is a key consideration and is achieved within the planning system through the AONB designation. The weight given to the WHS setting was illustrated by the decision by the planning inspectorate to refuse permission for the Navitus Bay windfarm. Although it is inappropriate to view this as precedent, it is a useful example. The windfarm was considered to have little negative impact on the OUV of the WHS but

both the planning inspectorate and IUCN considered negative impacts on the Site's setting to be of key significance in the decision to refuse permission for the scheme.
Clear guidance is also provided by the NPPF specifically regarding sites of geological, wildlife and landscape conservation interest (NPPF paragraphs 109, and 117), stipulating that planning policies should *"aim to prevent harm to geological conservation interests"* and enhance the natural environment by *"protecting and enhancing valued landscapes, geological conservation interests and soils".*
NPPF paragraph 114 states that local planning authorities should *"maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast".*
We consider it inappropriate to asses these integrated environmental considerations separately. Landscape quality, scientific value, habitats and the setting and OUV of the WHS are closely linked and underpinned by the ongoing natural processes of erosion.
The preferred management scheme for East Beach proposed by the draft BMP has the potential to mitigate negative impacts of all of the environmental considerations outlined in the NPPF guidance. It is sympathetic to the natural processes of erosion and includes an improved beach amenity and the possibility of better public access to the coast.
In contrast a rock revetment makes no such accommodations and would have significant negative impacts on the scientific value of the exposures and the OUV and setting of the WHS. It would significantly alter the character of an undeveloped part of the coast within an AONB and would fail to make any improvement to public access and enjoyment of the coast.

Issue E: *We understand EDDC has just granted planning permission for what amounts to a 10 year rock armouring trial at Branscombe. Is there any reason why this approach should not be considered at Sidmouth's East Beach?*
It is important that planning applications are considered on their own merits. However, we suggest that the two schemes are not comparable for two reasons.

1. the landscape quality at Branscombe is already compromised by an existing rock revetment and the geological interests impacted are not as sensitive as those at Sidmouth.
2. The temporary permission at Branscombe requires an exit strategy for the removal of the new rock revetment, existing defences and the holiday chalets in ten years or before. This process of adaptation will lead to an overall improvement of the condition of the WHS, SAC and AONB in the short to medium term. In contrast the proposals being developed for the Sidmouth BMP represent permanent impacts to an otherwise pristine landscape and natural environment and a reduction in the quality of the geological and other scientific interests.

Please refer to the attached table for a more detailed comparison.

Additional comments

In 2015 the Jurassic Coast Team worked with Dorset County Council and Dorset AONB Team to undertake a piece of work to evaluate the value of Dorset's Environmental Economy. The study, undertaken by Ash Futures consultants was all encompassing, but included a detailed case study into the economic impact of the Jurassic Coast World Heritage Site designation. The reports are available to download from the Jurassic Coast Website.

Whilst the wider analyses included the Dorset AONB, the assessment of the Jurassic Coast included activities in East Devon. The summary paper included the following statements:

"While it is advisable to avoid a single measure of the environmental economy, the central estimate is that it contributes, on a comparable basis with other economic statistics, about ***£1.5bn of GVA p.a. and supports about 30,000 jobs*** *in Dorset – or 8-10% of total annual economic output and employment."*

"*The Jurassic Coast influences circa* ***£103-119 million of output p.a.*** *(mid-point £111 million)*

- *While these estimates can not be attributed to the designations specifically****, it is likely that their existence has increased the scale of benefits to the area significantly****"*

It is clear that the natural environment is a hugely valuable asset to the area and its benefit is enhanced by the World Heritage status of the coast. Protection of the natural environment, and mitigation of negative impacts upon it, are actions worthy of investment.

Conclusion

The East Devon AONB team support the principles of the guidance information provided in this document.

Due to the scientific and landscape sensitivities described above Natural England and the Jurassic Coast World Heritage Team take the position that a rock revetment along east beach would be environmentally unacceptable for two key reasons.

1. A rock revetment is a hard coastal defence and as such does not fit with SMP policy and does not allow for any mitigation of the permanent negative impacts coastal defences will have on the OUV of the WHS and the geological interests of the SSSI.
2. A rock revetment is likely to have significant negative impact on the setting of the WHS and does not allow for improved beach access or amenity.

Differences between rock armour proposals at Sidmouth and rock armour granted permission at Branscombe

Branscombe	**Sidmouth**
Temporary 10 year permission	Permanent impacts

Brings existing “illegal” rock armour within planning controls and provides legal requirement for removal in 10 years time	
Relatively small extension to existing unconsented rock armour	+200m of new defence in otherwise natural area of coast
‘Exit strategy’ required by conditions (3) Covers: Removal, restoration of beach, relocation of chalets, interim measures if damaged within 10 year period	Permanent impact
Impacts on SAC, AONB and WHS setting Small additional impact for temporary 10 year period but “restoration”/enhancement in 10 years’ time.	All these impacts PLUS impact on OUV of WHS at this specific location Whether rock armour is at base of cliff or offset impact will be the same because talus slope will form between cliff base and rock armour if offset. (If offset there will also be less/no beach for people to use at any time).
Monitoring and management plan Required to monitor impacts on surrounding coast/beach and mitigation for harm	Permanent impact