

Date: 26 August 2021
Direct phone: 01395571630
Direct email: tbuxton-smith@eastdevon.gov.uk
Our ref: SEBBMPAUG01



Mr Scriven
Jurassic Coast Trust
Mountfield
Bridport
DT3 JP

Mr Townsend
Hornbeam House
Crewe Business Park Electra Way
Crewe
Cheshire
CW1 6GJ

Dear Mr Scriven and Mr Townsend

Reply to Letter Dated 6th August

Thank you for both your emails with attached letters dated 6th August.

As we were all copied in on each letter from you both, I have penned the following joint reply to both letters. Apologies for the delay, but I have only recently been able to access the recording of the meeting and wanted to listen through again.

The letters are a very timely reminder that we must not forget the non-built environment whilst trying to reduce flood and erosion risk to the built environment.

Jurassic Coast and Natural England.

On behalf of East Devon District Council, I wanted to reassure both the Jurassic Coast Trust, and Natural England that we are very aware of the important environmental designations on the East Cliff site. However, we also need to listen to the concerns of local people at risk of losing their homes and businesses from

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Blackdown House, Border Road, Phone: 01404 515616
Heathpark Industrial Estate, Email: csc@eastdevon.gov.uk
Honiton, EX14 1EJ eastdevon.gov.uk
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flooding and erosion. That is why we are looking at all available options to us, including ones that may go against previous advice, as time has passed, and the cliff erosion continues at an unnatural rate which threatens people homes from coastal erosion and serious flooding.

I have now had chance to listen to the whole recording and accept there were instances where it appeared people within the group appeared negative against statutory consultees. However, to balance this, during the meeting it was frequently stated that further consultation with Natural England would be required should we deviate from the preferred option.

Again, listening back, I note we were facing many questions from group members about Natural England and Jurassic Trust Coast. We tried to answer them, perhaps not correctly, and in hindsight should not have attempted to answer them on behalf of Natural England and the Jurassic Coast Trust. Listening back, one point was repeated. For clarity are Jurassic Coast Trust and Natural England able to state formal approval for a project outside of the planning process?

Stakeholders' views

Many of the views were from Sidmouth residents, so they are free to voice their opinion on what they believe to be most important to them. I am a civil engineer by profession, so confident within the engineering aspects, but less so on environmental issues and designations so I apologise if I let statements stand uncorrected.

At EDDC we do not have any one with the experience and knowledge of the designated areas, so we would welcome both Natural England and Jurassic Coast Trust's attendance at future meetings. Although we have a project board, given the current drive for openness and transparency, it is likely that most meetings will occur in the public realm, rather than a non-public project board.

We are planning the next advisory group meeting during the week commencing 27th September. I was wondering if either NE or JCT are able to do a short presentation to the group, regarding the details of the designations, to further highlight the site's importance to the wider group.

Within our 'pause scope', we have an activity allowance for the environment and designation investigation and consultation, however we have delayed this until we find a possible alternative that both better technical and but also affordable. One possible concept is looking most promising, so we will shortly be looking at the environmental considerations on this and requiring both your inputs.

Branscombe Beach

It is accepted that Branscombe beach environmental sensitivities are different to East Beach, so it's not a true like for like representation, however the principle that a new temporary installation has been granted within the World Heritage Site is well known to the local stakeholders. Away from East Devon there are examples of other coastal protection schemes which have been implemented without support from bodies representing their designated status. This is not a route EDDC wants to go down, however we need a balance between protecting people and the natural environment. The Environment Agency is introducing its `adaptive pathways` policy, which although early days, is an attempt to look at the long-term issues, and where appropriate use short term temporary measures to delay the transition to a more long-term changes if it provides net benefits to people and place.

Although this is currently hypothetical, should we apply and have temporary planning permission granted, we as the local planning authority, would be risking bringing the council into disrepute should we breach one of our own planning conditions (by not removing the rock). Should we apply, we would have a strong exit strategy, which would be for a maximum 5-10 year temporary revetment, or once the BMP is completed, whichever occurs first. The rock will be required for any of the possible BMP options, so it will be recycled into any new structure.

Paragraph 172

The council administration are supporting open and transparent meetings, we have to discuss this option publically. If we settle on an alternative scheme, which delays the BMP further, we would employ a consultant to initiate the planning process and should the council then decide to apply for temporary permission, we would engage with yourselves prior to and during any application being developed and submitted.

We are acutely aware that UNESCO has removed Liverpool's World Heritage Site status, and do not want this replicated in Devon on the Jurassic Coast.

Cliff Road Housing Drainage

I have been unable to find the reason why it was dropped, but I believe it to be due to the following reasons. Cliff top erosion occurs from both the base, and top down. You can do works to reduce top down erosion, but these won't be effective until the base erosion has been slowed, therefore tackling the base erosion is needed first, and more cost effective. The top down erosion can be slowed, but it won't have as big an effect as slowing the erosion rate. As the original 'preferred' option had a funding gap of £1.5m, I would imagine cliff top drainage was probably dropped from the scope as it was unaffordable. However, given the funding

envelope has increased, cliff top drainage could be considered in the detailed design stage.

Advisory Group meetings

I am pleased that both the Jurassic Coast and NE are committed to working with EDDC and the BMP Advisory Group, to develop an affordable and environmentally acceptable solution. EDDC are keen to work with both the Jurassic Coast and Natural England. As you are aware we have a fully funded 'preferred' option, however it has compromises on three fronts. Environmental impact at East Beach, Visual and Economic Impact in the built environment, and sustainability/financial concerns regarding ongoing recharge and recycling of the beach. We believe there is an alternative option that will reduce the compromises with the preferred option or alternatively with the benefit if the extra funding contributes to offset the effects of any compromise with the preferred option.

Thank you both for your advice, and I can assure you that we welcome the engagement of the Jurassic Coast Trust and Natural England and happy to discuss the various options, their implications, and the effects they will have on this very important designated site.

We look forward to a zoom meeting in the very near future

Thanks

Tom

Yours sincerely

Tom Buxton-Smith
Engineering Projects Manager