

East Devon local plan consultation

Comments in relation to the conservation and management of the Jurassic Coast World Heritage Site

Richard Edmonds,
Earth Science Manager,
Jurassic Coast Team,
C/O Environmental Services,
Dorset County Council,
County Hall,
Dorchester DT 1 1XJ
E-mail: r.edmonds@dorsetcc.gov.uk

Our Reference number for the Plan: 191

The way the plan, web site and questionnaire are structured:

I tried to use the web site to respond to each question but it did not appear to work while the thought of filling in all the fields for each question was too much having already waded through the plan. Also, it is not possible to view both the document and the response forms once into the latter and this makes writing the comments difficult. Therefore I compiled them into a word document which has now evolved into this letter. Furthermore, once completed, we are returned to the start of the Plan rather than the place we were at and therefore have to navigate back to the previous place in it. When I started to submit comments under each question, I had no confidence that they were actually being sent, hence turning my list of comments into this letter and sending it directly to you at the planning address.

Also, there was nowhere to make any general comments on the plan so here they are:

The plan starts by visiting each of the towns, then goes onto overarching policy and then into a section about specific developments/ambitions in some of the local towns. This is all very confusing. The overarching policy should be first followed by what it means in each of the towns. The whole thing is massively too long and it is very difficult to see any clear vision or strategic strands that hold it together.

Specifics on the Plan

2.4 talks about an elderly population and is then followed by '*How East Devon should change*'. I am not suggesting that this arrangement implies that old people are part of the problem but it could be interpreted as that.

2.5. We have not seen the proposals at this stage so it is impossible to say at this stage if we would support them or advocate a different approach a bit picky I know.

'3.11 protecting existing open space and areas designated for environmental purposes as well as protecting and conserving the undesignated countryside' I would suggest '.....designated for their high environmental value.....' And I would suggest there should be an aim to also enhance or improve the undesignated countryside.

4.1 h. it is England's only natural world heritage site for (suggest include natural)

5.6 Suggest: '.....Sites designated under European legislation ~~and~~ include the Exe Estuary, the Pebblebed Heaths, the River Axe corridor and the undeveloped coastline between Sidmouth ~~Seaton~~ and Lyme Regis ~~are included~~.'

Chapter 9

9.3. Recognition of the value of the landscape extends to the Otter Estuary but there is no mention of the coast and the World Heritage Site.

There is no reference to planning/adapting or being mindful of the future pressures that may arise from coastal erosion and potential impacts of climate change. At the very least there should be recognition of the existing and potential increased risks with time. Government guidance now includes the identification of Coastal Change Management Areas and the plan should recognise the risk and the need to be thinking about future challenges in these areas. This does appear later but that is my point about the overall structure of the plan..... it is covered in part 2 of the plan BUT we want to know how that policy allies in each of the towns as we read about them I feel.

10.8 The estuary and landscape are referenced as natural assets to conserve and enhance but the World Heritage Site / the coast is missing from this list

As my comment in 9.3

'Promoting the town as a high quality tourist destination capitalising on its waterfront assets.'

As 9.3 and in addition, there is the flood risk in the town and surrounding area..... surely the plan should recognise this? One area to consider would be increasing resilience against the risk of coastal flooding and to revisit the emergency plan for the town to ensure that everyone knows what to do in the event of a major storm.

13.1 Where 'Jurassic Coast is mentioned, I would prefer 'Jurassic Coast World Heritage Site' or better still 'the Dorset and East Devon Coast World Heritage Site'

13.2: The following extract is incorrect

'The draft Shoreline Management Plan 2, recommends that in the short, medium and long term (100 years) a policy of "hold the line" is adopted for Seaton Seafront (East of West Walk) and the estuary mouth, while "managed re-alignment" is advocated within the upper estuary. For the cliffs to the West, from Seaton to Seaton Hole, a short term "hold the line" policy would be replaced by a "managed re-alignment" in the medium and long term, in recognition of the primacy of erosive processes in the geological importance of the coastline (World Heritage Site) (Draft SMP2)'

The change in SMP policy between Seaton and Seaton Hole (unit 6a30) is NOT due to the importance of the geology; This area lies OUTSIDE the World Heritage Site boundary. The change in policy is due to the recognition that the cliff will continue to recede despite the rock armoured defence and that the defence will have to be moved back from time to time as the cliffs recede.

As with 9.3 above: There is no reference to the risk to property and infrastructure due to erosion and the possible impacts of climate change. Government guidance now includes the identification of Coastal Change Management Areas and the plan should recognise the risk and the need to be thinking about future challenges in these areas. One area to consider would be increasing resilience against the risk of coastal

flooding and to revisit the emergency plan for the town to ensure that everyone knows what to do in the event of a major storm.

14.2

'The draft Shoreline Management Plan 2, recommends that in the short, medium and long term (100 years) a policy of "hold the line" is adopted for Sidmouth seafront West of the River Sid to the Chit Rocks. For the River Sid and East Sidmouth the Shoreline Management Plan 2 recommends "managed realignment" through beach management from the present day through to the long term.'

It would be useful to mention the policy units: Sidmouth is unit 6a36 and the River Sid and Sidmouth (east) is 6a35.

As 9.3: same comment applies

Draft strategy 23. Is very light on improving landscape and wildlife through appropriate forms of agriculture. There are areas along the coast where intensive agriculture is carried out right up to the coast path. There would be considerable benefits to tourism to see a wider, more natural buffer to the coast in these areas (e.g. Ladram through to the Otter. Similar policy should support existing conservation initiatives near SSSI's and Local Nature Reserves for instance, where possible.

Chapter 17: Climate Change. This chapter is focused entirely on tackling the causes of climate change (rightly or wrongly) but there is no discussion on the possible impacts of climate change; increased coastal erosion and flooding, possible drier summers and wetter winters, impacts on agriculture etc..... In terms of the issue; what East Devon can do to mitigate the factors causing climate change are very limited to what East Devon needs to think about in terms of the effects of climate change on the district..... what should this chapter be about?

18.2. In the context of this chapter protecting the natural interests, including the coast, is about allowing it to erode. The balance of the two bullet points is all wrong and missing some other important factors. I would suggest (underlined):

18.20 East Devon's exceptional coastline forms part of a World Heritage Site (WHS) and is mostly undeveloped. Parts of the coast are eroding and in some cases this impacts on people's livelihood and homes. We will:

- Discourage development in undeveloped coastal areas if it would have adverse landscape impacts unless there are no alternatives available, (such as with established holiday parks) and development is essential.

Discourage development that will become increasingly at risk from future erosion.

- Promote coastal protection measures where the Shoreline Management Plan 2 identifies it as sustainable and appropriate.

Create coastal change policy areas to manage transition in areas where people, property or infrastructure are likely to be at increased risk in the future.

18.27. The World Heritage Site Management plan aims to protect the Outstanding Universal Value of the site. IT IS INCORRECT TO STATE THAT; 'This plan seeks to balance this aim with the social and economic needs of our coastal communities.

The Plan does intend to use WHS status as a threat for communities and the economy but not to the detriment of the site itself.

I have a real problem with the following draft strategy:

Consultation Local Plan – Draft Strategy 39 Coastal Erosion

'Along the Jurassic Coast WHS, the outstanding universal value of the WHS will be conserved by allowing natural processes to continue, unless the safety and economic well being of any coastal community would be undermined, provided that the implications of this for the Jurassic Coast have been fully considered.'

The discussion that follows is also confusing: The future coastal management is defined within the SMP review so why not make direct reference to it? There is a conflict and the issue is, where possible to balance that conflict.

I think that what this should say is something like:

'The Dorset and East Devon World Heritage Site will be conserved by allowing natural processes to continue. The Shoreline Management Plan identifies future coastal management options for the next 100 years. In a few areas there are conflicts between protecting the Site, by allowing it to erode, and protecting coastal communities from that erosion. There is a need to recognise both interests and, wherever possible, mitigate impacts where they arise. The SMP not only supports the construction of coastal defences but it also identifies areas where communities and infrastructure will have to be moved back in the longer term as the cliffs erode.

The wording in **New Proposed Policy EN23 - Coastal Defence Schemes** is actually better still..... I would take some of that and apply it here.

There is a typo in:

18.50 *'The Council has formed the view, after receiving advice from Natural England (the government agency responsible for the promotion of wildlife), that there is a risk that any proposal for residential development of at IEast one net additional.....'*
[least?]

19. There is a need to recognise that some coastal areas may have to change; i.e. start to move back as a result of coastal erosion. The SMP identifies these areas and even though they are all in the medium or long term, this plan should recognise the issue and start to prepare the ground for that change. Otherwise we may see development in the wrong places and ever increasing constraints on our ability to move back due to development that fills any possible space to accommodate that role back.

2.14 Policy S4 .2 needs to include coastal erosion alongside flooding. The National Coastal Erosion Risk lines, when eventually made available, will provide a guide to that risk in coastal areas.

Policy S5 should also make reference to flood and coastal risk erosion?

21.52. The SMP's use the draft National Coastal Erosion Risk lines to illustrate the risks from coastal erosion. These lines will be validated shortly and made available as a separate product to the SMP itself.

New Proposed Policy EN24 Typo: Section 6: there are two .. at the end of the last sentence

H13 part 3. I have a problem with this: in many cases the residual value of the property at risk, with say 20 years of life left in it, will be the asset that will enable to owner to make the move and construct a new property. We should be looking to

facilitate these changes long before the property is about to go over the edge of the cliff. That does double the amount of property but considering that we are talking about a very small number of properties at risk over a long time frame while the plan is primarily about identifying provision for thousands of new properties in the future, this should not be an issue. Furthermore, most of the change along the coast is catastrophic and not gradual and therefore a property deemed at risk could go over the cliff in a couple of years or could stay unaffected for 20 years or more.....

Chapter 21

Why are some of those specific proposals placed here and not in the earlier chapters about the towns? This is my big problem with the structure of the plan; it is broken up into Part 1: a look at each of the major towns, then goes into Part 2: planning policy and emerges on the other side with these exciting proposals that now sit entirely divorced from what most people would consider the meat of the plan; where they live. So someone could look at Part 1, read all about Seaton and miss everything that is in this section!

Finally: I have pointed out to others in the team areas of the plan that encompass their interests; principally communities, tourism, economy, transport etc and they may come back separately with their own comments.

I hope that helps. Sorry to be a bit short in places but it is a very long document and the way it is set up and the feedback process makes it an even longer process to comment..... it is enough to drive someone to drink!

Happy Christmas,

Richard Edmonds