

REPORT

Sidmouth Beach Management Scheme: Outline Business Case

Stakeholder Engagement Plan

Client: East Devon District Council

Reference: PC1679-RHD-ZZ-XX-RP-C-0001

Status: P02/S1

Date: 29 March 2022



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Document title: Sidmouth Beach Management Scheme:
Outline Business Case
Document short title: Sidmouth Beach Management Scheme OBC SEP
Reference: I&BPB6525R011D02
Status: P02/S1
Date: 29 March 2022
Project name: Sidmouth OBC
Project number: PC1679
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Date: 29/03/2022

Classification

Open

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1 Introduction

The Sidmouth frontage has a long history of the construction and maintenance of coastal flooding and erosion risk management schemes. Following sea storms of 1989 and 1990 the Sidmouth Town frontage experienced substantial damage to existing defences and substantial volumes of shingle were lost to the east of Sidmouth. This storm damage triggered the need for upgraded coastal flood and erosion risk management measures. The need for further works was triggered following storms in 1993 and 1994.

The current flood and coastal erosion risk management measures along the Sidmouth Town frontage were constructed over many phases between 1991 and 2000 and comprise seawalls, rock revetments, splash wall, rock groynes, offshore rock breakwaters, a river training wall / arm coupled with beach recharge and recycling as required. Wave overtopping and the subsequent risk of coastal flooding along the Sidmouth town frontage is generally controlled by the retained beach in front of the seawall and the low splash wall that is situated on the landward side of the promenade. The beach, in conjunction with the buried rock revetment, also helps to protect the seawall from undermining and subsequent potential failure. Over recent years, beach levels have dropped to lower than the design level (which was set as part of the 1990s schemes); and in places the toe of the seawall is now exposed. This results in increased wave reflection on the exposed vertical seawall which exacerbates wave overtopping and increases the risk of subsequent flooding. The wave reflection also exacerbates the reduction in the already low beach levels.

The East Beach frontage consists of Pennington Point cliffs which has a small shingle beach at its base. The cliffs are otherwise undefended. The Pennington Point cliffs are eroding, and thereby retreating. Causes of erosion are associated with weathering and lack of drainage from above the cliffs, along with wave impact on the lower cliff. Beach levels have lowered in recent years causing more exposure of the cliff toe to wave action. The continued erosion of the cliffs is now posing a risk of outflanking of the Sidmouth Town defences; erosion of the cliff is resulting in the gradual increased exposure of the western river wall of the River Sid to coastal sea storm conditions (primarily from easterly / south-easterly directions). It is recognised that East Cliff is also subject to erosion as a result of other physical processes (e.g. weathering from above due to intense rainfall / insufficient drainage).

In addition, as East Cliff continues to erode over the next 100 years, the Alma Bridge will become unsustainable in its current position. The western wall of the River Sid, which currently provides fluvial flood defence, will become increasingly exposed to full coastal conditions. Therefore, there will be an increased likelihood of defence failure and thus occurrence of flood damages over time.

Therefore, **East Devon District Council (EDDC) are to progress the design and construction of a coastal erosion and flood mitigation scheme along the coastline at Sidmouth, herein referred to, as the Sidmouth Beach Management Scheme (SBMS)**. The preferred option for the SBMS currently comprises a mixture of short-term and longer-term works and includes the following:

- Beach recharge (with shingle) along the town beach frontage.
- Raised splash wall and flood gates to 1m high at key locations.
- New long groyne and beach nourishment at East Beach.
- New boat ramp.
- Raising existing splash wall by 100mm along the promenade with new foundations enabling raising of the splash wall further when overtopping rates become unacceptable in the mid to long term (to be refined at detailed design stage).
- Construction of one breakwater (rock islands) in front of the Town beach (dimensions and location to be refined at detailed design stage).

Figure 1.1 Proposed Sidmouth Beach Management Scheme

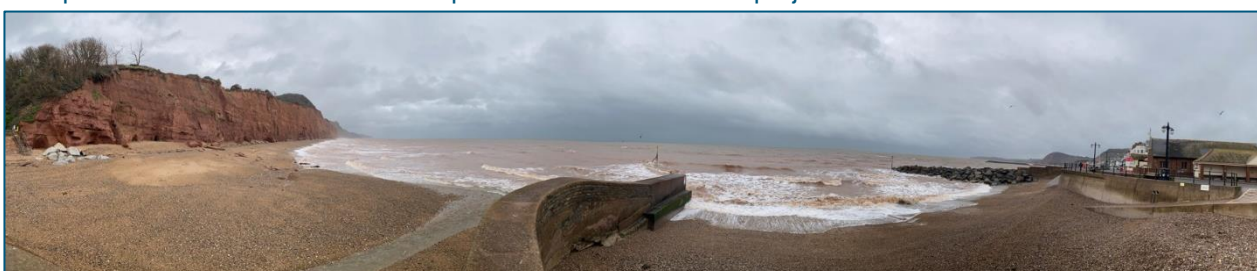


To further provide supporting evidence for the implementation of the preferred option for the SBMS, **EDDC are preparing an Outline Business Case (OBC) following the updated Partnership Funding Calculator for Flood and Coastal Erosion Risk Management (FCERM) projects by the Environment Agency in 2020**. As such, this Stakeholder Engagement Plan (SEP) sets out the arrangements for ensuring robust stakeholder input to the development of the OBC as well as providing a platform for the formal consultation process as required under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (herein referred to as 'the EIA Regulations').

The SEP aims to:

- Clarify the roles and responsibilities of the project team for specific aspects of internal and external communication (using a single named contact as far as possible).
- Set key objectives for stakeholder engagement in relation to the OBC process.
- Establish a list of relevant stakeholders and group them according to interest, influence and expertise in relation to the SBMS.
- Identify engagement strategies for the different stakeholder groups to promote effective engagement.
- Provide a framework for collaborative stakeholder engagement with East Devon District Council (EDDC) to ensure consistency for existing stakeholders and other interested parties.

It should be noted: This SEP will be a live document that is updated as the project develops and stakeholder engagement evolves. Input from stakeholders and responses from consultation will feed into the ongoing design process linked to the preferred option to ensure that stakeholder views are fully incorporated and a clear feedback loop is demonstrated for the project.



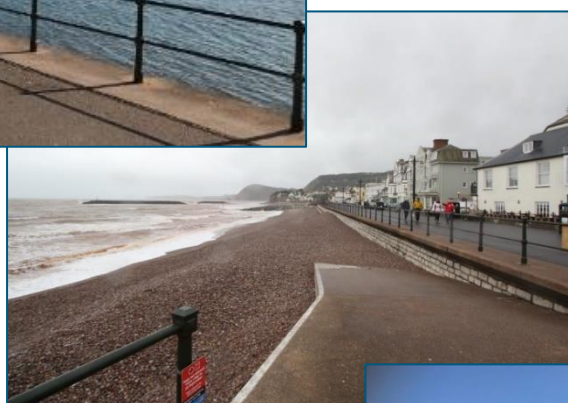
2 Project Team Roles and Responsibilities

The EDDC team is led by **Tom Buxton-Smith** (Engineering Projects Manager). EDDC has commissioned Royal HaskoningDHV to produce the OBC and supporting evidence for the implementation of the preferred option of the SBMS. The Royal HaskoningDHV team is led by **Lucia Stothert** (Project Manager) and **Tom Green** (Assistant Project Manager).

Primary communication between the two Project Teams (EDDC and Royal HaskoningDHV) will be led by Tom Buxton-Smith and Lucia Stothert. Stakeholder engagement will be led by Lucia Stothert and Peter Brunner at Royal HaskoningDHV in collaboration with Tom Buxton-Smith (EDDC).

Direct stakeholder engagement will be primarily delivered through correspondence via emails; meetings (via Teams or Face-Face) with the Sidmouth Beach Management Steering Group (SG); and the statutory advisors (further detail is provided in **Section 5**).

Royal HaskoningDHV will maintain an '**Issues Log**' which will capture points raised through stakeholder engagement and document any follow up actions taken. This can include direct changes to the development of the OBC, further communication actions and other specific activities which may be developed on a reactive basis. The Issues Log will form part of the overall SEP and will be continually updated throughout the course of the OBC (see **Appendix I**).



3 Context

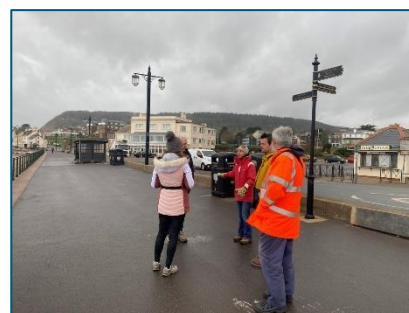
3.1 Progress to date

As stated in **Section 1**, work on a coastal erosion and flood mitigation scheme along the coastline at Sidmouth has been ongoing for a number of years, including the development of the Sidmouth Beach Management Plan (SBMP); and EDDC have maintained strong stakeholder engagement throughout. As well as regular meetings with the SG there have been public consultation events and exhibitions, the feedback from which has been incorporated into developing the SBMP and preferred option for the SBMS (see **Figure 1**).

The stakeholder engagement carried out to date has raised a number of key issues which provide an important context for communication planning going forward for the development of the OBC for the preferred option. These are:

- **Timescales** – stakeholders, particularly affected residents, have strong concerns about the implications for delay and there is a perception that progress is unnecessarily slow.
- **Economics** – stakeholders appear to appreciate the relative costs associated with the different options, although the complexities around partnership funding and the Flood Defence Grant in Aid (FDGiA) process are potentially not fully understood.
- **Visual impacts and effects on the visitor economy** – Sidmouth is a coastal destination and the beach is a core asset; any potential impacts on this feature is of concern to local business operators and residents alike.
- **Politics** – as a Local Authority led process, the development of a SBMS is influenced by the political landscape which is subject to change and a number of external factors.
- **Environment** – limited appreciation amongst local people, and politicians of the constraints of working within the various environmental designations on East Beach

In order to ensure all issues raised through the stakeholder engagement process are fully documented, an Issues Log will be maintained (see **Appendix I**). Not only will this provide an audit trail of concerns raised throughout the development of the OBC, but it will also provide a point of reference for updating the SEP and a record of how stakeholder input has been used to inform the ongoing design process.



4 Engagement Objectives

The OBC is the next step in realising the funding opportunities to assist in delivery of the preferred option of the SBMS. The objectives in engaging stakeholders in this process can therefore be defined as follows:

- **To seek stakeholder input on the preferred option (see Figure 1).** Stakeholder engagement at this stage is sought to refine the preferred option rather than alter or expand it and this represents an important shift from the appraisal of the options.
- **To help stakeholders understand that the preferred option is the most technically and environmentally sustainable option.** Support exists in some stakeholder groups for the construction of additional offshore breakwater or demountable flood defences and these options continue to be explored.
- **To help stakeholders understand the OBC process and how this fits within the broader process necessary to draw down funding.** An ongoing concern raised by public stakeholders in particular is the apparent slow progress; helping them to understand the formal process EDDC is required to follow will help manage expectations.
- **To help stakeholders understand the need for local funding in order to deliver the scheme.** Government funding alone may not be sufficient to fund construction of the preferred option, which may need to be made clear to all stakeholders.
- **To help stakeholders understand the environmental constraints on the SBMS and how this has influenced the preferred option.** The Sidmouth and East Beach frontage is highly designated for environmental reasons and it is important that stakeholders understand the need to balance this protection with the need to manage flood and coastal erosion risk for residents.
- **To encourage stakeholder ownership of the SBMS and the option being taken forward.** The construction phase of any scheme will be disruptive to the local community (albeit temporarily); and buy-in from those affected on a daily basis, will foster positive relationships going forward.
- **To maintain the lines of communication already established and to continue to engage the stakeholders on a regular basis such that they feel informed and part of the process.** EDDC have strong indirect engagement platforms which are understood by the stakeholder community; and it will be imperative to continue to use these in the interests of consistency.
- **To ensure EDDC receives robust input from statutory and non-statutory consultees to inform the legal and consenting obligations that must be discharged in order to progress the preferred option of the SBMS.** Consultation forms an integral part of the required consenting processes both terrestrial and marine; ongoing engagement with the stakeholder community will ensure all concerns are addressed in a timely manner thereby avoiding unnecessary delay.
- **To establish strong feedback loops enabling EDDC to incorporate suggestions and recommendations from the stakeholder community; and robustly demonstrate how the design process has been influenced by local engagement.**

As with every aspect of this SEP, the above objectives should be viewed as a 'live list' and subject to ongoing review. Engagement activities should achieve some or all of these objectives and provide a framework for the delivery of direct events such as meetings and indirect events such as public exhibitions.

5 Stakeholder Mapping and Engagement

5.1 Stakeholder Mapping

Table 5.1 lists the stakeholders that were identified following discussion between EDDC and Royal HaskoningDHV. It is recommended that this list is continually reviewed, particularly in light of comments received from key stakeholder groups such as the SG.

Table 5.1 Consultee List

Stakeholder Name	Type/Influence	Group
Statutory Consultees/ Primary Advisors (as relevant for the terrestrial planning and marine licensing processes, including EIA)		
EDDC Planning Team*	Statutory/Direct	Group 1
Marine Management Organisation (MMO)*	Statutory/Direct	Group 1
Natural England (NE)*	Statutory/Direct	Group 1
Environment Agency (EA)*	Statutory/Direct	Group 1
English Heritage (EH)*	Statutory/Direct	Group 1
Cefas	Non-statutory/Direct	Group 1
Relevant Local Authorities (i.e. Devon County Council, Sidmouth Town Council)*	Statutory/Direct	Group 1
East Devon Area of Outstanding Natural Beauty (AONB)*	Non-statutory/ Direct	Group 1
EDDC Landscape Architect	Statutory/Direct	Group 1
EDDC Heritage/Conservation Officer	Statutory/Direct	Group 1
EDDC Public Rights of Way Officer	Statutory/Direct	Group 1
Jurassic Coast Team (World Heritage Site)*	Non-statutory/Direct	Group 1
Devon Wildlife Trust (DWT)	NGO/Direct	Group 1
West Country Rivers Trust	NGO/Direct	Group 1
Landowners (not already included)		
National Trust*	Private/Direct	Group 1
South West Water*	Private/Direct	Group 1
Private Landowners (mostly represented on the Steering Group, see below)	Private/Direct	Group 1

* Also members of the Steering (Advisory) Group

Steering (Advisory) Group (not already included)		
Cliff Road Action Group	Public/Direct	Group 2
Sidmouth Chamber of Commerce	Public/Direct	Group 2
Vision Group for Sidmouth	Public/Direct	Group 2
Sid Vale Association	Public/Direct	Group 2
The Esplanade Hotel**	Public/Direct	Group 2
Wyndham Court Hotel**	Public/Direct	Group 2
The Royal York and Faulkner Hotel**	Public/Direct	Group 2
Sidmouth Hotels**	Public/Direct	Group 2
Salt Rock Restaurant**	Public/Direct	Group 2
Beach House**	Public/Direct	Group 2
Mocha on the Beach Restaurant**	Public/Direct	Group 2
Hotel Elizabeth**	Public/Direct	Group 2
The Kingswood Hotel**	Public/Direct	Group 2
The Pea Green Boat Restaurant**	Public/Direct	Group 2
The Marine Restaurant**	Public/Direct	Group 2
Hotel Riviera**	Public/Direct	Group 2
Bedford Hotel**	Public/Direct	Group 2
Sidmouth Sailing Club and Sea Anglers	Public/Direct	Group 2
Sidmouth Lifeboat (An Independent Charity)	Public/Direct	Group 2
Local Fishermen	Public/Direct	Group 2
Other specific interested parties		
East Devon Alliance (EDA)	Public/Indirect	Group 3
The Royal Society for the Protection of Birds (RSPB)	Private/ Indirect	Group 3
Devon & Severn Inshore Fisheries and Conservation Authority (IFCA)	Public/Indirect	Group 3
Other Site Users		
Local Sidmouth community (residents)	Public/ Direct	Group 4
Wider public community (visitors)	Public/ Indirect	Group 4

** Collectively all grouped and represented by one to two individuals who represent the hotel and restaurants of the frontage

Other Water and Beach Users	Public/Indirect	Group 4
Other		
Local MPs	Private/Indirect	Group 4

5.2 Engagement Approaches

The four groups identified through the stakeholder mapping exercise will be targeted in slightly different ways in recognition of their level of influence and interest with the main differences being related to:

- The means of communication with each stakeholder;
- The frequency, nature and duration of communication;
- The supporting media; and
- The relevant feedback mechanism.

Regardless of the approach used, the information being shared will aim to be meaningful and accessible. Coastal management is a complex process with highly technical design processes and assessment methods. The use of plain English, non-technical language and succinct delivery is essential.

5.2.1 Group 1 – Statutory Consultees and Primary Advisors

The terrestrial planning and marine licensing processes require engagement with a number of key consultees as laid down in statute. The consenting authorities also seek advice from a number of non-statutory bodies in relation to specific applications with particular influence or interest in certain subject areas. For example, the MMO will regularly consult with Cefas on marine ecology aspects and associated licence applications. For projects that require EIA (which will most likely be required for the SBMS), the consultation obligations are described in the relevant Regulations and the statutory advisors have a key role in steering the scope of the investigations carried out to inform the EIA process.

Although most of the organisations identified in Group 1 are members of the SG, it will be necessary at times to engage with them on project specific technical matters relevant for EIA. It is suggested that this engagement takes place without the SG for the preparation of the EIA; **and is primarily achieved only through correspondence via emails; and meetings via teleconferences (or face-face)**, as diaries allow. Ongoing consultation with the statutory and non-statutory bodies that have influence over the consenting process will be maintained as the OBC and EIA develops for the SBMS.

5.2.2 Group 2 – SBMS Steering Group

This SBMS SG is an active and knowledgeable group who have been involved throughout the development of the SBMS and represent key stakeholders including local residents and user groups. EDDC organises regular meetings of this group and these will be used to provide detailed updates on progress and to respond to any specific queries and issues that may arise. In order to ensure that the meetings are as productive as possible non-technical briefings will be provided in advance to allow SG members time to formulate questions/discussion points and enable effective engagement. SG members should be made aware that should they wish to raise questions/issues at any time during the OBC process (not only in the meetings) this avenue of communication is open to them. This will be important to facilitate a continuous dialogue and promote ownership.

It is anticipated that SG meetings held during the new 2022 OBC phase will cover the following key topics:

- **Background to the SBMS, next steps and tasks covered under the RHDHV contract;**
- **Review of the options discussed to date for the SBMS;**
- **Presentation of the preferred option for the SBMS;**
- **Discussion on risks associated with preferred option for the SBMS;**
- **Input on the refinement process in preparation of the OBC.**

5.2.3 Group 3 – Other Interested Parties

Decision making around flood risk and coastal management has the potential to impact on a wide range of stakeholders and in Sidmouth there are other parties with specific interest in being engaged in the development of the SBMS. Whilst these groups may not have formal membership of the SBMS SG they may attend meetings and have views to contribute that may be of value to the OBC process. As part of the local community it is important that they continue to feel engaged and have some level of ownership over the scheme.

For those present at the SG meetings there will be opportunity for direct engagement and the opportunity to raise questions between such events will be facilitated. **Outside of these meetings this group will be engaged primarily through indirect means using a range of traditional and online media including the EDDC website, Facebook, Twitter, e-newsletter, local press and resident’s magazine.** The Communications Team at EDDC has developed a strong Communications Plan for informing the public on matters pertaining to the SBMS and any activities related to the OBC phase would be aligned with this ensuring a collaborative approach and consistency for stakeholders. In accordance with Council policy, EDDC invites members of the public to submit queries/comments through their website on any aspect of the Council’s work and this maintains a route for dialogue in relation to the SBMS between targeted communication events.

5.2.4 Group 4 – Wider Public Community

As a key coastal destination, the economy of Sidmouth is strongly supported by tourism and the seafront is a fundamental element of the visitor attraction. Decisions that have the potential to affect the future visitor experience could therefore be of interest to a much wider stakeholder community. Statistics indicate that Sidmouth attracts both relatively local (i.e. within Devon) as well as more distant visitors and it would be beneficial to provide opportunities for these stakeholders to engage should they so wish.

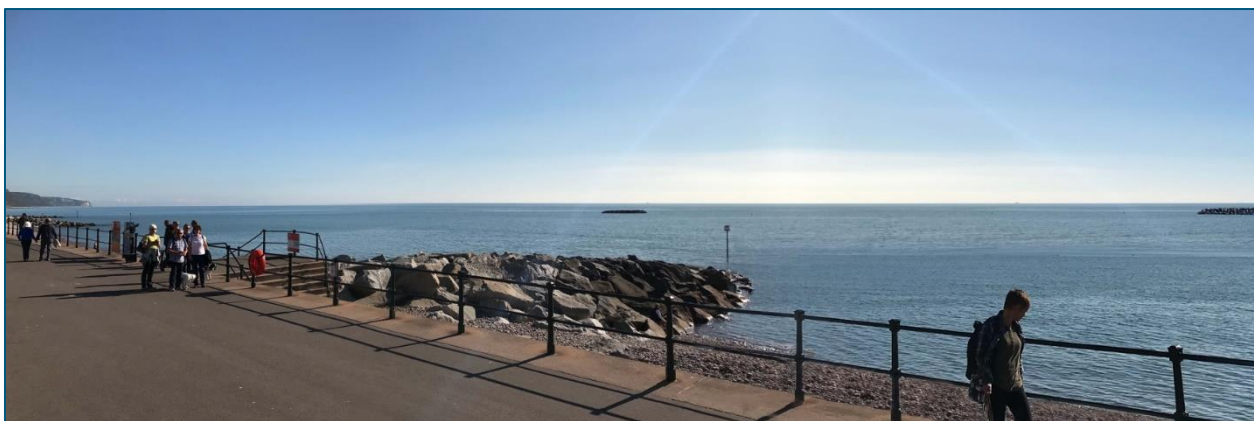
This group will have **access to many of the indirect communications identified for Group 3, particularly online and social media.** Promulgating information through a range of media will ensure that even more distant stakeholders have opportunity to remain informed and provide input as the OBC develops. The ‘Frequently Asked Questions’ section of the EDDC website will provide an invaluable reference point for those stakeholders not involved in direct engagement and this will continue to be updated as the technical work progresses. In accordance with Council policy, EDDC invites members of the public to submit queries/comments through their website on any aspect of the Council’s work and this maintains a route for dialogue in relation to the SBMS between targeted communication events.

5.2.5 Public Exhibitions

Public exhibitions are incredibly useful in informing the entire stakeholder community and they offer an opportunity for members of all stakeholder groups to engage directly with the technical team working to develop the OBC. They offer a visual and often immersive opportunity to engage and are of particular importance for promoting local ownership and addressing misconceptions. As well as prime opportunities to capture views on the preferred option for the SBMS, the public exhibitions offer an invaluable forum to seek feedback on the effectiveness of stakeholder engagement. **There is potential for a public exhibition to present options considered for the SBMS and the final preferred option to be taken through to the OBC and Final Business Case (FBC), although the implementation and timings of public exhibitions are to be confirmed with EDDC.**

5.2.6 Stakeholder Engagement To Date

Appendix II provides a stakeholder engagement ‘**Communication Log**’ undertaken on the SBMS (after 2017) for the preparation of the 2022 OBC; and takes into consideration the above stakeholder mapping exercise and engagement approach.



6 Summary and Review

This SEP sets out the proposed approach to stakeholder engagement in relation to the SBMS OBC process. Building on the historical context, the objectives of this SEP are designed to promote positive engagement and promote ownership of the SBMS preferred option among the local residents and wider stakeholder community of Sidmouth and East Beach.

This will be a live document that is updated as the OBC develops and stakeholder engagement evolves. To ensure the SEP stays relevant and responsive it will continuously be reviewed to ensure:

- Consistency of communication and message – this will make sure that stakeholders understand the methods, timings and channels for engagement thereby mitigating misunderstandings and promoting ownership.
- Genuine responses to feedback – Lines of communication and avenues for dialogue will stay open throughout the option refinement process to ensure that stakeholders can contribute and receive responses in a meaningful way and see how their input has been used.

The Issues Log and Communications Log (**Appendix I** and **Appendix II**) will be maintained and these will inform any updates to the SEP. It will also provide an audit trail to evidence how stakeholder contributions have ultimately been taken forward.

Appendix 1: Issues (Risk) Log

Issue Number	Issue Title	Issue/Question	Source	Response(s)	Actions Taken	Latest Update	Status
2017 SBMS							
1	Delays	Why hasn't construction started yet?	East Cliff Residents Association	In order to draw down Government funding to deliver the scheme identified in the BMP, EDDC must follow the formal process administered by the EA. This requires a number of technical stages to justify the economic and environmental sustainability of the proposed scheme. These studies can be time consuming, however, it is important that we understand the potential impacts of any proposed scheme so that any negative impact on the environment can be avoided.	Promulgate plain English description of the FCRMGiA process.	April 2017	Closed
2	Costs	Option 4b (as to remove the rock groynes on the shore and create four new offshore 'reefs'), is preferred by locals; why isn't this being taken forward?	Local MP	<p>Funding for beach management projects from Government comes through what is known as FCRMGiA via a process administered by the EA. The amount of FCRMGiA a project is eligible for is linked to the predicted damages from flooding and coastal erosion, as well as the number of residential properties benefitting from a reduction in risk.</p> <p>Where the amount of FCRMGiA for an eligible project is less than the total cost of a scheme, the shortfall has to be made up through partnership contributions. Typically, partnership contributions are sought from beneficiaries of a project such as infrastructure owners (utility companies, highways authorities etc), local communities, businesses and developers. This is referred to as partnership funding.</p> <p>Option 4b is approximately three times more expensive than Option 1 (existing defences essentially maintained with another one or two groynes built on east beach), and it is unlikely that the partnership funding required to deliver this option will be available.</p>	Ongoing review of Option 4b with particular focus on costs and feasibility	June 2017	Closed
Post 2017 SBMS Sidmouth Beach Management Scheme – 2022 OBC							
3	New OBC 2022	<p>Risk Workshop: Environment</p> <ol style="list-style-type: none"> Overall approval of the SBMS by Natural England, EA and MMO. EDDC and/or MMO delay in determination of EIA screening letter for the sign off for the SBMS. Design freeze not achieved. Further environmental surveys required for the EIA beyond what is anticipated. River Sid – Migratory fish impacts. River Sid – Water quality impacts. Mitigation of SSSI/SAC cliff habitats. Public and heritage value perception of the Sidmouth frontage. 	Steering (Advisory) Group	Detailed within the Risk Workshop Matrix – PC1679 - Small Project Risk Analysis Tool	Ongoing; and to be addressed in the updated Preliminary Environmental Information Report (PIER) for the OBC.	16/2/2022	Open

Appendix 2: Communications Log

Date	Stakeholder Group	Nature of Communication	Outcomes/Actions
<i>2017 SBMS</i>			
3/8/2017	1	Meeting to discuss scope of EIA; covered key issues and expectations including requirements and availability of baseline data.	Memo completed and 'signed off' by attendees to confirm scope of EIA. To be used as a basis for discussion with the MMO about the MLA
18/8/2017	1,2,3,4	Press release introducing RHDHV, providing date of forthcoming SG meeting and confirming key facts about the BMP.	
13/9/2017	2	Steering Group meeting to introduce RHDHV, explain role in the project and present timescales.	Various (see minutes from meeting); next meeting Jan 2018
21/9/2017	1,2,3,4	Press release following up Steering Group meeting to inform wider public of the discussions and key actions/outcomes from the meeting and planned next steps.	
Post 2017 SBMS Sidmouth Beach Management Scheme – 2022 OBC			
17/12/2019	1,2	Steering (Advisory) Group – General Council Meeting	
19/12/2019	1,2	Steering (Advisory) Group – General discussions on panel installations for the SBMS.	
26/2/2020	2	Steering (Advisory) Group – Discussions on existing SBMS – Coastal modelling and way forward towards the preferred option for the SBMS. Key Steering Group member was Tony Birch (EDDC).	
6/10/2020	2	Steering (Advisory) Group – General Meeting	
3/7/2021	2	Steering (Advisory) Group – General Meeting	
15/7/2021	2	Steering (Advisory) Group – General Meeting	
30/7/2021	2	Steering (Advisory) Group – General Meeting	

2/9/2021	Sub-Consultants Meeting	Sub-Consultants Meeting	
28/9/2021	1,2	Steering (Advisory) Group – Natural England and Jurassic Coast Team	
21/11/2021	Project Team Meeting	Project Team Meeting regarding the Landscape and Visual Impact Assessment (LVIA) for the SBMS.	
1/2/2022	1,2	Steering (Advisory) Group – Sidmouth New OBC - Risk Workshop	