

Full name: Geoff Jung

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:

Introduction

The consultation response to the Coastal Change Management Areas has been mainly uncontroversial but for one key area which is land above East Beach, which is East of the River Sid.

This area is within the UNESCO world heritage site known as the Jurassic Coast, and it is generally accepted that natural erosion should be unimpeded, with rock falls and gradual erosion along most of its length.

However, the section which has housing development close to the cliff edge above East Beach where the rate of erosion has been effected by increased engineering at Town beach for the last 3 hundred years.

These included:

The man-made construction of the Sidmouth promenade along the top of the pebble beach. Built in early Victorian area.

The excavation of a railway tunnel behind the cliff in the Victorian period but was abandoned.

The river training wall that restricts tidal flows and beach build up on East Beach.

Rock Islands introduced in the 1990s that has helped protect the Sidmouth Sea front.

Therefore, this section of East Beach has been subject to numerous un-natural increased changes that have significantly changed the erosion rates, recognised in the many reports that have been provided in the last 40 years.

The Sidmouth and East Beach Management Plan/Scheme, which is now in its design stage identified the Cliffs above East Beach as a natural protection to the risk of the town's defences being outflanked by storms from the south-east quadrant

This is why a key measure identified in the Outline Business Case for the forthcoming Beach Management Scheme is to build a large rock groyne or island off East beach and introduce a much larger pebble beach under the cliffs to return the cliffs to a more stable more natural erosion rate.

Conclusion.

Because there is no conclusive, accurate data or analysis to this small section of coast that has been effected by various engineered events and will in the near future be effected again by the Beach Management plan with expected reduced rate of cliff erosion the following report needs to reflect this.

Case for changing the CCMA for the area east of the River Sid and Sidmouth East

The following is taken from East Devon Local Plan – Topic Paper – CCF- 005 Adaptation and Resilience to Climate Change: Coastal Change Yellow highlighted for information relevant to East Beach.

This was noted and discussed at a Strategic Planning meeting on the 5th of Nov 2024 and the following notes included Topic Paper CCF 005

2.5 In East Devon the SMP sets out four general approaches :

a. No active intervention – do not defend. This is where no defences are present, and it would be technically, economically, or environmentally unsustainable to introduce defences due to their impact on other communities, or on sites protected for their environmental importance. This applies mainly to parts of the coast that adjoin areas of countryside (except for the western part of the Budleigh Salterton). Sections of coast identified for no active intervention include from Orcombe Rocks (Exmouth) to Budleigh Salterton West; the Otter spit: Otterton Ledge, Budleigh Salterton to Chit Rocks, Sidmouth; Salcombe Hill to Beer; Beer to Seaton Hole; Axe Estuary spit and from Haven Cliff west to Monmouth Beach (Lyme Regis).

b. Hold the existing defence line - maintain/replace. This is where protection is currently provided by coastal defence structures or managed beaches, and the intention is to retain a defence along approximately the current alignment. This will involve replacing defences when needed. Defence type, method and standard of protection may be modified over time. This applies to the Exe Estuary (from the lower Clyst to Exmouth Spit) and the main coastal settlements (from Exmouth Pier to Orcombe Rocks; Sidmouth; Beer; Seaton west to Axe Estuary spit; Axe Estuary Seaton West; Axe Estuary (Mouth Breakwater to Axmouth North).

c. Managed realignment - set back defence. This is where the intention is to defend elsewhere in flood plain inland from present shoreline or allow erosion/recession to a defined alignment. New defences might be constructed at that new location if needed. This may involve the creation of inter-tidal habitat. This applies to the Otter Estuary

(where the Lower Otter Restoration Project has delivered floodplain reconnection and habitat creation that has helped to reduce flood risk within the estuary) and part of the Axe Estuary (Axmouth North to Seaton North).

d. Managed realignment - slow erosion. This is where measures might be introduced or permitted that slow, not stop, erosion of cliffs or other features at the back of the shoreline. This applies to River Sid and Sidmouth East and in the medium- and long-term epochs for Seaton Hole to Seaton West.

In the case of the River Sid and Sidmouth East, there is a recognition that a higher recharged beach with a rock super groyne or offshore breakwater will reduce or slow the erosion to a much lesser extent than has recently been observed.

Blue suggested change

Red Note

4.5 Following the Regulation 18 consultation, a further option for the Sidmouth Beach Management Plan (BMP) was agreed. This includes constructions designed to slow the rate of erosion from the existing levels, on which the University of Plymouth work is based. It is anticipated that the work will be complete by 2030. The Sidmouth and East Beach Outline Business Case (BMP OBC) included a plan that shows a much slower retreat rate than the 'Plymouth' study. Whilst this rate of erosion is still higher than the 'original' BMP estimated (needs to be included) erosion rate, there are no projected erosion lines following implementation of the BMP so future monitoring will be needed to inform a new erosion rate.

4.6 The 5th of November Strategic Planning Committee agreed to draw this part of the CCMA boundary in accordance with the BMP OBC line. (NOTE however, there is no certainty to the erosion rate to this unfinished project) This is in accordance with the principle of considering recent evidence from detailed studies in the designation of a CCMA. It also reflects the fact that the Plymouth work was based on past erosion rates and did not take account of the proposed works at Sidmouth that will slow the rate of erosion.

4.7 Most recently, the SMP's have been updated with maps that show the new National Coastal Erosion Risk Mapping (NCERM), which provides the most up to date national picture of coastal erosion risk for England. The relevant map 34 shows the coastal erosion risk projection climate change (upper end), 2105 to be very similar to that of the Sidmouth BMP OBC (see appendix A for plans from various sources that show differing erosion rates). This provides further evidence to justify the reduction in the size of the CCMA to the east of the River Sid in the Regulation 19 local plan.

However, as the final design and specification for the BMP/BMS has not yet been designed or its effect determined it would be premature to quantify the erosion rate at this point.

Therefore because of new, as yet unknown factors that will only become apparent once the Sidmouth and East Beach project is finalised, the projected erosion rate is unable to be estimated accurately, and the estimation using the “worst case” scenario would be unjustified .

Conclusion

The solution is to either not include any defined line or use the BMP OBC line but with a “health warning” that this is not yet conclusive line.

See maps on following page with yellow health warning

Therefore, some note of caution needs to be inserted to provide clarity and guidance

Map 34