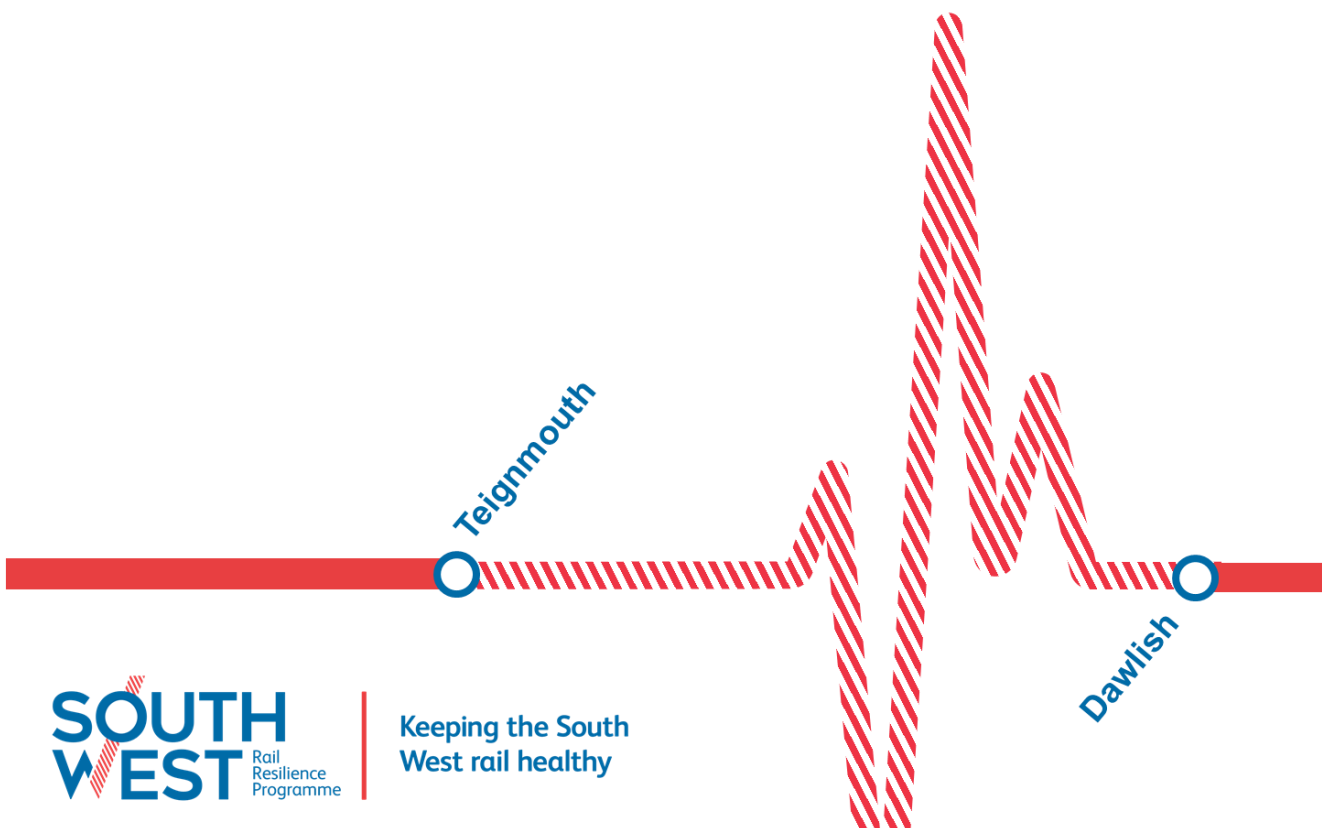


# Parson's Tunnel to Teignmouth Resilience Project

Public consultation 20 January – 1 March 2020

Responses from public bodies

Please note: These are verbatim responses with no changes to spelling, punctuation or grammar in order to faithfully reproduce what was submitted. Names of individuals have been redacted.



## Network Rail Proposed Resilience Work - Parsons Tunnel to Teignmouth

Teignmouth Town Councillors discussed the latest round of consultation at an Extraordinary Finance and General Purposes Committee meeting held on 25 February 2020. Whilst Councillors acknowledge that changes have been made in response to feedback, they still feel that a great deal more can be done to achieve the best result.

Councillors unanimously agreed to request that a review be immediately undertaken in conjunction with local stakeholders and councils to consider all engineering options to defend the railway, improve public safety and to reduce the negative impact on local communities, businesses and the environment. The review could benefit Network Rail by delivering not only greater line resilience and service reliability, but by encouraging more members of the public to travel by rail for the enhanced experience our coastal railway resorts could offer.

Key comments made by Councillors included:

- Concerns raised about how the work will affect the coastline in the wider area not just at Teignmouth and Holcombe
  - The railway is paramount to the area with 60 return journeys a day between Teignmouth and Exeter
  - A request that the beach groynes are sorted and the beach re-charged in conjunction with the Environment Agency so that the beach is in a sound condition before any work takes place
  - Disappointment that the environmental impact assessment has not yet been done
  - There are no wave buoys monitoring the sea
  - A request to improve other amenities, for example, the instalment of a lift at the railway station to improve accessibility
  - There is a need to strengthen the cliffs to protect properties and the railway
- Phone 01626 775030 E-mail [traceyhiggs@teignmouth-devon.gov.uk](mailto:traceyhiggs@teignmouth-devon.gov.uk)
- The railway line is also important for freight, not just passengers
  - Would be beneficial to have a safer path.

We thank you for the opportunities to enable people to feed back on the plans.

Yours faithfully

Town Mayor

Chairman of Finance and General Purposes Committee

## Parson's Tunnel to Teignmouth Resilience Project Response from the Teignmouth Town Centre Management Partnership

Thank you for the opportunity to respond to the public consultation on the proposed scheme. The Teignmouth Town Centre Management Partnership (TTCMP) was pleased to see the Network Rail responses on the Summer 2019 consultation (dated 18th June 2019).

1. Welcome. The Partnership welcome the increase in the number of access points to the beaches, the decision to make the new walkway pedestrian only and the additional information on the proposed construction method.

2. Sediment Movement and effects on beaches. The Partnership continue to require details of the outcomes of the modelling and studies being carried out into the effects of the works on sediment movement and on the beaches.

Exactly what effects are expected, what changes to the design will be made as a consequence and what amelioration measures will take place with what result?

We cannot over emphasise enough the importance of the beaches in general to the town and of Teignmouth Town Beach in particular.

3. Alignment Change? It is understood that following discussions at various consultation meetings that there may be a possibility, at the Teignmouth end of the proposed works, to retain the existing radius of the rail alignment for a greater distance, (than the design shows at present) before moving the alignment out towards Sprey Point. This could increase the amount of beach available on this stretch at low tide. If this is a genuine possibility, we would like to see it explored.

4. Colour of new Sea Wall. There is affection in the town for the natural stone of the existing sea wall which varies in colour and type of stone. On the other hand, there is equal concern about replacing it with the stark grey concrete. The Partnership would like consideration being given to using appropriately coloured aggregates and pigments to better fit in with the colour of the Teignmouth Breccia of the cliffs.

5. Effects of the Works and Legacy. The scheme will change the nature of Teignmouth and its eastern boundary both during and after its construction. It will leave a legacy which we hope will be positive. We would therefore like the following to be explored:-

a) Before and During Construction. i. Advance works to enhance the seafront/promenade area to compensate for the loss of the walkway to Parson's Tunnel and the disruption caused by the works. Ideally such works would leave a legacy for the future in the town. These could include:-

- The reinstatement of the seaward end of the pier to provide somewhere for people to promenade
- The extension of the skateboarding park to the area on the lighthouse side of the prom with more challenging slopes etc for older children
- Extend and enhance the provision of floral displays with an additional spring planting from Easter onwards
- Beach showers operating in the summer season
- Water bottle filling stations in the seafront area etc

ii. In addition to the seafront the long awaited lift should be installed by Network Rail in Teignmouth Station to avoid the disabled having a 400m diversion along public roads and an industrial estate to

get from one side of the station to the other.

b) As part of the main works. i. Treat the design of the new walkway very much as the 'Teignmouth Eastern Promenade'. ii. This could include the recycling of some of the dimension stone from the present structures (perhaps utilising some of the granite wave return shaped copings as seats/tables?) iii. Suitable representation of I.K.Brunel's contribution to the line's history including information, statue

We would be happy to participate in any discussions on the above.

We would also like to be kept informed of progress and developments including the outcomes of studies into the effects of the scheme on the movement of sand and sediment between Holcombe and the Teign Estuary.

Yours sincerely

Chair Teignmouth Town Centre Management Partnership

[Email to Mark Langman from DCC Planning, Transportation & Environment]

### Parson's Tunnel to Teignmouth Resilience Proposals - Cycling

With reference to the above Devon County Council (DCC) has examined with some interest the latest design for the project.

As you know DCC has, as part of the Peninsula Rail Task Force, been campaigning for the resilience works to the mainline railway to be completed since 2016, with resilience along the sea wall its number 1 priority. The closure of the rail line for 6 weeks in 2014 was a significant disruption to passengers and cost an estimated £1.3billion to the South West economy. It is imperative that all is done to prevent a reoccurrence of this event. Progression of the Parsons Tunnel to Teignmouth project is therefore vital. It is essential that the safety and resilience works provide protection that can withstand expected changes in climate and sea levels to ensure resilience is not just for now, but for the future. In turn this will give passengers and businesses confidence in the rail network and the region, boosting patronage and supporting inward investment.

DCC welcomes the replacement of the public right of way on the seaward side of the railway line which will maintain and enhance the visitor experience. We also welcome the provision of a new permissive coastal path on a section of the landward side of the railway. But we remain concerned about the lack of continuous cycle provision as in practice this would be an attractive route.

As you are aware DCC previously provided a position statement on the cycling network where we set out our long term aspiration of delivering the Teign Estuary Trail as part of our strategic aim to provide a sustainable, multi-user route between Newton Abbot and Teignmouth and between Teignmouth and Dawlish town centre. You will recall that between Holcombe and Teignmouth DCC were looking at two options:

- A waterfront route integrated with Network Rail's provision of coastal amenity facilities. This continues to be our preferred option.
- An inland route passing along the A379, via Cliff Road and Eastcliff Walk to Teignmouth. This looks very challenging in terms of topography, planning and land acquisition

The waterfront route presents a great opportunity to enhance the experience of visitors using the Teign Estuary Trail. This could comprise of the new landward permissive path plus the need for a shared use facility between Sprey Point and Teignmouth. Whilst we previously had accepted that there were constraints which would not allow the construction of a path of sufficient width to accommodate all users, I would be grateful if we could look at this again and, if possible, work together towards a solution that would allow for the new path(s) to be used as part of the multi-use Teign Estuary Trail. We would like to work together to see if this can be addressed by means of the Transport and Works Act that Network Rail need to progress the scheme

Yours sincerely

Chief Planner

Please find below comments from Teign Heritage (Teignmouth and Shaldon Museum) relating to the consultation on the latest Network Rail iteration of the Parson's Tunnel to Teignmouth Resilience Project 2020 - ending on 1st March 2020.

We, the trustees from Teign Heritage, welcome the chance to comment on these proposals. We believe that this latest proposal is a welcome improvement on the previous consultation proposal, however, there are several very significant issues which remain to be solved and factors for the team to be aware of, which we believe a significant further revision to the proposal should be able to overcome.

#### Heritage issues

Brunel's seawall. We believe that the original Brunel seawall (built by the world-famous engineer) which has had relatively few additions, or alterations since being built in 1845/6 is a significant national and international asset. As such future design proposals should much better reflect the original designs and spirit of this hugely significant asset, which was a great engineering feat of its time and continues to serve the national rail network well. We also believe that alternative proposals have not, to date, been investigated seriously enough that would enable the complete, or substantial preservation of the existing seawall. We strongly believe that this much photographed and visited location, which has adorned promotional material for both the South West of England and the rail industry itself for the last 100 years, deserves to be looked at afresh by Network Rail in terms of the impact of the proposed resilience project solutions, particularly in light of the major significance of this asset.

Historic wreck site - scheduled ancient monument - a possible Venetian wreck located in the sea off Teignmouth, known as Church Rock Wreck. We note that Network Rail intends to avoid disturbing this site and likewise strongly believe this wreck site should be avoided by all works undertaken and infrastructure in relation to sea wall construction proposals. We, as an organisation, remain guardians of many historic artefacts from this wreck and holders of vital information regarding this wreck. We would very much wish to maintain an ongoing dialogue with Network Rail regarding this wreck, should this be required; if further artefacts are discovered; or if works close to the wreck are required.

World War 2 pillbox (gun emplacement) adjacent to Parson's Tunnel. We previously stated that this should be safeguarded in its current state and avoided by all works and proposed infrastructure related to the proposals. We continue to believe strongly that this should be safeguarded and avoided by all construction works and infrastructure related to the proposal. While we note that this is not a listed building, or structure, it is a very notable heritage asset. Revised proposals appear to not make reference to this structure and it is apparent from the proposals and the location of the pillbox, that it is likely to be possible to safeguard this asset, with only very minor adjustments to the design of new seaward side wall adjacent to Parson's Tunnel. We believe that in the event that any further revised proposals which would require demolition of this asset, they should be strongly based in evidence as to why no other alternative solution was possible.

Sprey Point Teignmouth sign. We note the proposed changes to Sprey Point and now strongly welcome the proposed retention of, or addition of a new permanent Teignmouth sign structure at the Sprey Point area, albeit in a new location. This location is iconic to residents of and visitors to Teignmouth, as well as to travellers along the Great Western mainline into the South West peninsula.

We note that there is no reference to the historic limekiln located on the landward side of the existing railway line - we previously stated that this should be safeguarded in its current state and avoided by all works and proposed infrastructure related to the proposals. Should this need to be removed, as appears to be proposed in the revised plans, we would like Network Rail to explicitly state that it

intends to remove this and provide its reasons. We have appended further information from Teign Heritage on this feature at Appendix One.

#### Beach

We, along with very many residents of and visitors to Teignmouth, Holcombe and surrounding area continue to be extremely concerned by the proposal to remove a large section of beach to facilitate these infrastructure works, along a large part of this route. While the revised proposals are not as significant in their effect as the previous iteration, these remain a concern. Tourism was worth an estimated £263m annually to the Teignbridge economy alone in 2018, much of which is focused in the Teignmouth area and any significant impact upon both the beach and the aesthetics of the highly prominent and visible seawall area, has the potential to seriously damage this.

We believe that revised proposals to date continue to not address this issue or explore whether and how the provision of additional beach material in front of the new seawall, could in fact both act as barrier to protect the new seawall from storm impacts and provide an improved beach resource. It should be noted that significant additions of sand as both a coastal protection measure and visitor resource are commonplace and have been implemented at a variety of locations in the UK, including at Dawlish Warren, Lyme Regis, Bridport and more notably and on a much larger scale at Bacton in Norfolk; Skegness; Hayling Island; Bournemouth and particularly the Netherlands, where this forms a major aspect of the management of coastal defences. Most of these schemes are significantly larger in scale than anything that would be required to maintain a larger beach at Holcombe and/or Teignmouth, than would be indicated by the present Network Rail proposal.

#### Access

Further access points should be explored along the seawall, as a safety measure to enable people to escape from waves and high tides and as a leisure resource. This should be a relatively straightforward design addition and we are somewhat surprised that this revised proposal does not now include these features.

#### Aesthetics

A new seawall should be coloured appropriately (reddish), including where possible using appropriate rock types, as with the current seawall to blend with its sensitive surroundings, as opposed to being in standard grey. Designs should be kept as unobtrusive and simple as possible. Thousands of visitors on average use the sea wall between Teignmouth and Sprey Point, or Parson's Tunnel each week, it being an attraction its own right in its current state that blends with the environment. As previously stated, tourism was worth an estimated £263m annually to the Teignbridge economy alone in 2018, much of which is focused in the Teignmouth area.

Revetment proposals at Sprey Point in the current revised proposal are highly obtrusive and incredibly large, particularly for such a sensitive location and do not currently reflect the existing sea wall and natural environment. We wish to see additional improvements which scale back these elements to become significantly less obtrusive and more reflective of the current surrounding environment.

There is scope, over and above that proposed, to provide an alternative of some sort to the existing Sprey Point upon part of the proposed revetment area, which in terms of aesthetics would significantly lessen the visual impact of the current proposals in such a sensitive site and provide a species-rich habitat. It could and should be covered in salt resistant grasses and species such as Tamarisk as at present, which present minimal maintenance demands.

We welcome proposals for new access on the landward side of the line. Nonetheless, current proposals for high fences on the landward side of the railway line are incredibly and unnecessarily obtrusive. The

current seawall has a very low wall dividing the railway from the walkway, along which thousands of people manage to walk each week without incident. We understand the need for some potentially greater levels of separation between the new proposed landward side pathway and the railway, however, these proposals will be excessive, expensive and incredibly ugly from all sides, somewhat resembling a concentration camp from close-up and mitigating many of the aesthetic reasons for making improvements to attract visitors in the first place. We believe these fence proposals should be very significantly revised and scaled-back.

The seaward-side walk, is currently primarily open and partly protected by railings which can be seen through, including by people in wheelchairs, buggies and by children. The new proposals include a wall of 1.1m high which would not be able to be seen over by many of these visitors, removing much of the incentive for walking this route for many groups of people. We understand the reason for a higher wall designed to prevent overtopping, but believe that rather than designing it for physically lower down visitors to be sunk behind a wall from where they can't see, they should be higher-up and potentially with a simple and unobtrusive, see-through stainless steel railing provided instead if safety is required, similar to that on the existing Teignmouth seafront. This would ensure access and enjoyment for people of all backgrounds, including those with protected characteristics, which the current proposal does not do.

#### Natural environment

There is significant scope to create new nature habitats on the landward side, with Devon Wildlife Trust of the proposed railway line, which is currently a habitat for many birds and reptiles. Adders, buzzards and many species of crickets in particular are notable species present in this area currently and sites to retain and maintain their presence in this location should be encouraged.

As stated previously we also believe there is scope, significantly over and above that proposed, to provide an alternative of some sort to the existing Sprey Point upon part of the proposed seaward-side revetment area, which would maintain and provide a species-rich habitat. It could and should be covered in salt resistant grasses and species such as Tamarisk as at present, which present minimal maintenance demands.

Offshore it should be noted that there are currently reefs close-by to the existing Sprey Point and continuing in either direction. These provide a very significant wildlife habitat and visitor attraction and should be retained as much as possible. In addition, there are seagrass beds which provide a habitat for species, potentially including seahorses, that are slightly further offshore from the seawall. These should also be safeguarded in any works that are undertaken.

#### Alternative proposals

We continue to believe that there is additional scope to both significantly alter these proposals for the better, to ensure much closer alignment to the original Brunel Seawall; to potentially continue to explore an alternative that might include strategic rock-fall / avalanche shelters along the existing seawall; and to explore alternative proposals.

We understand that the building of avalanche style rock-fall shelters has been ruled out (except at Parson's tunnel) due to sandstone bedrock. We note, however, that not only is the bedrock also sandstone at both Parsons Tunnel, where the current proposal is for one shelter, but at the north side of Parson's tunnel is an existing long outdoor tunnel, similar to an avalanche style shelter, that is built on sandstone bedrock. We therefore ask that the reasons are published as part of why the Parson's tunnel proposal and existing sections north of Parson's tunnel work, or would work, but further small and strategically placed avalanche style shelters as part of a new proposal along parts of the existing seawall would not.



We recognise that some line closures may be required as part of a revised proposal (with rock-fall/avalanche shelters), but these happen in many locations already to ensure works can take place and that getting the right proposal in this location, which would be expected to last up to 100 years, is more important than preventing some line closures.

We would very much welcome working with you on any of the points we have listed and are happy to provide further information, should you require it.

Kind regards,

(Trustee - Teign Heritage)

On behalf of all Trustees of Teign Heritage.

## Appendix One

East Cliff Limekiln - a report by from Teign Heritage Archivist

It is highly likely that the lime kiln at Eastcliff was owned and built by George Hennet as an adjunct to his civil engineering projects. Hennet was a highly significant figure, a typical Victorian entrepreneur, and a contemporary and associate of I. K. Brunel. He was based in Teignmouth and residing in Shaldon towards the end of his life. He had considerable maritime interests as well as those involving the railway, bringing wealth and employment to the town. He was closely associated with the Atmospheric Railway, laying the track and pipes and building associated structures such as the pumping-engine houses. His unfortunate bankruptcy and subsequent death is probably the reason he is not celebrated as are other railway and canal contractors such as Thomas Brassey (see biographical note below regarding Hennet, taken from Wikipedia).

Following abandonment of the atmospheric means of propulsion in 1848-9, the main line of the South Devon Railway (SDR) on the sea wall was single, but there was a siding on the cliff side of the track just beyond the Eastcliff tunnel. This was known as 'Hennet's siding', and was gated at the Teignmouth end (There is a contemporary print of the tunnel end and siding with gate in Peter Kay's book, page 194). At first the siding ended before Sprey Point, and, among other uses, would seem to have served the lime kiln, delivering limestone (perhaps from Torquay or Stoneycombe quarries) and fuel (coal or culm) by rail and taking away the slaked lime it produced for either agricultural or construction purposes. There appears to have been no access to the kiln from the cliff top.

The East Cliff limekiln does, however, appear to be somewhat of an anomaly, since there was already one on the Old Quay which would have been much better located for delivery and recovery of materials by rail or sea. The kilns at Stoneycombe would have utilised limestone sourced from the adjacent quarry. The Teignmouth cliffs, being generally of sandstone, would have been unsuitable for limestone quarrying. The East Cliff rail siding itself must have been awkward in the extreme in use, as it was isolated from the town by the tunnel. Perhaps the kiln was sited there to provide lime mortar in situ, since the sea wall, completed and in use at this stage, must have required frequent maintenance due to the depredations of weather and the sea.

Somewhat overgrown today, the kiln has a sloping ramp for loading fuel and limestone (see photo

below). The upper opening for charging is not visible from the sea wall pathway, nor is the side opening for removal of quicklime; this would have been on the cliff-side of the kiln to protect the hygroscopic product from sea spray.

Hennet went bankrupt in 1853, and died in 1857, so it is likely the kiln dates from the early 1850s, in the period just after the Atmospheric was abandoned. It does not appear in Dawson's 1848 watercolours of the Atmospheric route. It must have been built subsequent to the sea wall, since it is level with the rail trackbed, high above the beach.

In Peter Kay's book, from which these data were derived, there is a discussion of the kiln on page 193. Kay speculates that although there is no definitive evidence, it is likely that the kiln was owned by Hennet (particularly as he had the only access to it, i.e. the railway siding). There is a hint of Hennet's ownership in the poster detailing the sale of Hennet's property at the Old Quay (and elsewhere) in the Port of Teignmouth dated 1857, where limekilns (plural) are mentioned, although it appears there was only one on the Old Quay itself (Peter Kay pages 214 & 216). The siding was bought by the SDR in 1857.

The kiln would have gone out of use through lack of access when the line was doubled and the siding abolished around the early 1880s, although it appears to have been retained as a store and refuge for men working on the cliffs.

This building is one of a very few surviving local structures almost certainly associated with George Hennet (another is the Bonded Warehouse at the quay, as shown in Peter Kay, page 214), its restoration, preservation and perhaps the placing of an explanatory plaque or information board opposite at the side of the walkway, would go some way towards paying tribute to a neglected Teignmothian.

Reference:

Kay, P., 1993: Exeter – Newton Abbot: a Railway History. Platform 5, Sheffield.

Addendum:

Excerpts from Wikipedia entry for George Hennet:

George Hennet (1799–1857) was an English railway engineer and contractor. He undertook many contracts for Isambard Kingdom Brunel's broad-gauge railways in the South West of England and funded the provision of extra facilities on the South Devon Railway, these formed the basis of a general trading business that he conducted.

He was awarded a contract to construct the track on the South Devon Railway in 1844 but later received additional contracts for wooden viaducts, bridges and stations. Further contracts were won for supplying and laying the pipes necessary for the atmospheric traction system and to build the engine houses for the atmospheric pumps and boilers. These contracts amounted to over £400,000, about 20 % of the total cost of the railway, and Hennet was able to buy back many of the atmospheric pipes for scrap once they were made redundant by its premature abandonment. Once the line was open, he also supplied some of the stock that ran on the line, was awarded a five-year maintenance contract. In 1851 he won a new contract for doubling the line near Totnes railway station. In 1853 the staff who had worked for Hennet were transferred to the Railway who then undertook their own engineering.

Hennet was married to the daughter of a timber merchant and started dealing in imported timber while living at Bristol and still undertaking railway contracts. His contracts with the South Devon Railway entailed him to build up a fleet of railway goods wagons. The Old Quay at Teignmouth was

central to this work. A siding had been laid to it by the railway company in 1849, and the following year Hennet bought the quay itself and developed a small fleet of ships to carry coal and other goods. In 1852 he was appointed as one of the Harbour Commissioners.

Following the failure of the atmospheric system, the South Devon Railway was short of money. Hennet proposed that he rent land alongside the line and build goods depots. These were both for his own trade and also for general traffic handled by the railway.

Depots were established at Exeter, Starcross, Dawlish, Teignmouth Eastcliff, Totnes, Rattery, Brent, Hemerdon and Plymouth. At Stoneycombe he established a quarry on railway land and laid a siding to serve limekilns that he built there.

Transport and Works Act – Network Rail (Parson’s Tunnel to Teignmouth Resilience) Order, Teignbridge District Council consultation response 29 February 2020.

This Council recognises the strategic importance of the mainline railway which serves the local towns of Teignmouth and Dawlish as well as the whole of the South West peninsular. It further recognises that the rail infrastructure needs to be resilient to both existing ground/cliff conditions and climate projections in respect of sea level change and storm impacts, as well as changes to precipitation trends. However this Council also has a desire to protect the natural environment, economic viability and amenity of the resort towns.

The Council received a presentation from Network Rail and considered a report on the Transport and Works Act Order consultation at a meeting of the Full Council on the 24 February 2020.

<https://democracy.teignbridge.gov.uk/ielistDocuments.aspx?CIId=165&MIId=1569&Ver=4>.

This included Paragraph 4.2 ‘The current consultation whilst a formal stage of the TWAO process comes before the publication of the majority of the technical information (including Environmental Assessment, coastal process modelling, construction methodologies, temporary structures and impacts, influences on adjacent beach sediment sources, bathing waters and local economics, final design and project resourcing), which will be required to be made available before the expected Public Inquiry in summer 2021. In the absence of technical information consultation comments can only therefore be made on the outline proposals. The Council will further engage at a later stage in its role as a ‘statutory objector’, when detailed information is published and its own commissioned evidence (bathymetric survey, BMP, modelling review) is completed.’

The report concluded that ‘The Council will become a ‘statutory objector’ within the (TWAO) process and will have the benefit of a suite of technical reports from the applicant to appraise alongside a few key pieces of information being compiled independently.

In the interim the Council is (only) able to respond to a current round of public consultation regarding an outline proposal.’

As this current opportunity is the only scheduled formal round of consultation and is being held before publication of the final proposed design, Environmental Statement, coastal modelling or economic appraisals, the Council therefore requests that the September ‘Information only’ events are uprated to be a consultation opportunity, so that local views can be properly represented when both Statutory Agencies and the wider public will have had access to, and time to properly appraise, the relevant information. This will in turn better inform the project determination processes through the TWAO Unit at the Department for Transport.

The Council wishes to confirm to Network Rail that the Environmental Statement will be expected to cover both near-field factors pertaining to the development and also far-field assessments particularly in regard to aspects such as coastal processes, sediment dynamics, water quality, economic impacts and landscape.

Comments on ‘Outline Design’ [1]

General

All of the following comments on the Outline Design should be read in the context as not being able to be properly informed through access to Coastal Modelling, Environmental Statement, and Economic Appraisal etc. which have yet to be published, as highlighted above.

The consultation materials do not include a simple map depicting the current alignment of the track and wall and the footprint of proposed development at an appropriate and measureable scale. This would typically be expected for any Planning Application (which would normally be required for proposals down to HLW – i.e. including the inter-tidal foreshore/beach) and/or any Marine License (which would be required up to MHW – i.e. also including the inter-tidal foreshore/beach), and is therefore requested to facilitate consideration of the current proposals being progressed under a

TWAO. The map should have also included reference to named states of tide (MLW/MLW Springs/MLW Neaps).

The Council requests urgent confirmation of the scale, design, footprint, temporal duration and impacts of a proposed offshore facility (landing pier up to 200m in extent) as this is required to feed into any meaningful analysis of coastal dynamics, sediment movements, influences on adjacent beaches (including a TDC/EA Beach Management Plan for Teignmouth), as well as recreational use of the area by swimmers and small craft.

The Council requests clarification on the reported 'MMO submitting an intention to defer EIA consent to the DfT' [2].

The proposal will have a negative impact on recreational opportunities through a loss of a proportion of the beach. In order to help offset this loss, TDC will expect a high quality of public realm to be provided.

Several of the following comments were originally suggested to Network Rail by either the Council or the Council hosted Teign Estuary and Coastal Partnership (TECP) [3] in July 2019.

#### Interactions with land/assets at the physical ends of the scheme

The current consultation does not identify how the tie in at Eastcliff will be achieved. The current seawall at Eastcliff and associated promenade is a TDC asset and we would welcome early discussion to identify how the new works and the existing assets can be improved to reflect to the proposed public realm improvements allowing for the continuation of a high quality and environmentally sensitive public realm.

No information has been presented on proposed changes to Smugglers Lane, and interaction with the A379, given that this is the only vehicular access to site and is depicted on the physical consultation model as considerably wider and cleared of trees and vegetation. [4]

#### Smugglers Lane interaction with wall/foreshore

The outline design includes a pedestrian underpass beneath the railway from Smugglers Lane leading to a long high walled ramp up to seawall walkway level. This would create a series of highly unpleasant public realm spaces such as blind, dark subterranean, 90° corners which would raise safety perception issues, particularly at dusk in a relatively remote rural location.

The long ramps on both sides of the underpass would require that the underpass would have to have drainage incorporated, which unless pumped (which includes maintenance resources) would have difficulty discharging at high water and therefore the underpass would risk being impassable at some states of tide.

The ramps and underpass are proposed to be unlit, but this would add to the feeling of vulnerability of any users and for safety and may require lighting which would not be appropriate for a rural location and would require ongoing maintenance.

As per earlier concerns/suggestions the Council/TECP would recommend a safer and more attractive alternative through the design and installation of an overbridge in this location. This would enable a clear line of sight for users approaching the area, making use of all available natural light, and negating the need for extensive drainage consideration. This would not only add to a sense of safety for users but if designed appropriately and in quality materials could be a positive addition to the rural coastal landscape, enabling a feature at the end of the seawall and higher vantage point at the beginning or end of the sea wall path.

An over bridge in this location could contribute to a sense of place making at this key access point.

A bridge alternative in this area (which could start slightly higher up Smugglers lane to limit the length of landward ramp), and the diversion of the stream as above would also allow for the creation of a larger and safer turning circle at the foot of this steep and narrow lane. This would allow better access by emergency vehicles as well as an expansion of the café offering and potentially reintroduction of

an accessible public toilet.

#### Footpath, shared use provision

This Council understands that contrary to earlier expectations (and depictions on the physical model) that it is not the intention to provide a cycle track across the site. This Council would wish to see the provision of a shared use path reinstated across the site.

It is noted that for the northern section of the route there will be two access routes, one along the seawall and one along the revetment between cliffs and track, which can offer a circular route for pedestrians which is welcomed. However experience from the Exe Estuary trail (especially the eastern bank) shows that there can be conflict between users of shared trails, particularly at busy times and where fast cyclists interact with pedestrians with pushchairs/small children and/or dogs. The Council therefore recommends the preferred option would be to preclude cyclists from the seawall route and have a shared use (pedestrians and cyclists) for the landward track along the buttress. This would leave a safer space for pedestrians to promenade along the seawall to enjoy the coastal environment and views without the risk of interaction with fast moving cyclists.

The video fly-through and model appears to indicate that the landward buttress track would only extend southwards from Smugglers Lane to around Sprey Point, i.e. only half of the length of the asset before crossing the railway with an over-bridge. This would result in only half of the route being able to be twin routes (seawall and buttress), therefore limiting the potential for a circular offering and the ability to separate pedestrians and cyclists as above. The Council therefore recommends that the landward cycle/footpath be extended as far south towards Teignmouth as is possible before having the overbridge to the seawall, thus limiting conflict between users, increasing safety and offering a greater choice to the users. The physical model indicates that there is space between the trail and proposed wall alignment approximately 100-200m north of Eastcliff to accommodate the ramp to the bridge without incurring any additional incursion onto the beach.[4]

The physical consultation model depicted a third path across the top of the butresses which in conversation with Network Rail staff at the events was indicated to be a path for maintenance purposes only. This should be made available as a public footpath which would offer a new and additional amenity asset and could link into the Mules Park area of Teignmouth.

#### Watercourses and drainage

The stream at Smugglers Lane currently flows from a short section of culvert discharging through an open span beneath the railway to exit and run across the surface of the beach. The Council / TECP previously recommended that the culvert be extended beneath the railway and the beach, and to be angled NE to discharge close to the headland/rocks to maximise the available dry area of beach area (i.e. without surface flowing water) remaining after the scheme, and is pleased to see this incorporated. However the consultation document indicates that the Smugglers Lane watercourse is to be diverted via a 500mm pipe – it is requested that consideration is given to specifying a larger pipe to future proof the discharge capabilities in an era of changing climate.

This culvert should be appropriately designed in accordance to guidance issued by DCC - <https://www.devon.gov.uk/floodriskmanagement/land-drainage-consent/>

Consideration should be given to the impacts of tide locking on any proposed re-alignment of the culvert

Given the significant gradient Smuggler Lane, the culverted watercourse is known to surcharge during times of high flow, consideration should be given to improvements which can be made to the watercourse running adjacent to the lane.

The significant gradient of the Lane also conveys significant amount of runoff generated within the area (together with exceedance from the culverted watercourse). Although the lane has some surface water provision, consideration will need to be given to the impoundment of surface water behind the

new sea wall which will enclose the current underbridge. This is likely to be a hazard to users of the footway proposed under the existing arches. Appropriate surface water management techniques should be considered in the storage/disposal and improvement of the current surface water provision. Appropriate surface water management techniques should be employed in the permanent design of both the sea wall and geotechnical techniques (including proposed footways) and temporary management of surface water during construction period.

The principal reason being promoted for the realignment of the track to allow for the construction of significant bunds is to combat a perceived threat of catastrophic compound wedge failure within the cliffs. However the consultation materials give little or any details of how the cliffs and the proposed bund could be effectively drained, where any discharge points would be located, and the interactions of drainage points on any residual beach, for example exacerbated localised scour around discharge points.

### Water Quality

The Council requires that the impacts both during and post construction on the designated Bathing Beaches at Teignmouth and Holcombe be properly assessed and mitigated so as not to compromise the Excellent water quality standards at both beaches and recently awarded Blue Flag status for Teignmouth Beach.

### Access and egress to the beach and water, and place-making

Much of the frontage of the new scheme is intended to be finished with a rock revetment from wall height to the foreshore. Typically constructed from large granite boulders, rock revetments can pose public safety issues as there is the possibility of leg traps between the boulders in an inter-tidal environment and often the level of the revetment is set below the sea wall crest to discourage access to and scrambling across the rocks. A rock revetment is a difficult surface to come alongside in a small boat/kayak/SUP or to exit the water from for a swimmer and hence the almost 2km length of vertical seawall or revetment proposed between Parsons Tunnel and Teignmouth offers very little chance of egress from the water for recreational users or for rescue/safety purposes. Currently there are slipways accessible on either side of the Sprey Point feature, whereas the outline design proposes three sets of relatively narrow steps, one at either end of the revetment and one offset from Sprey Point. The Council / TECP recommends consideration of a 20-30m width section of the revetment to be replaced with large scale concrete steps following the same approximate profile and footprint as the boulder revetment which would allow egress from the water as well as being available for the public to sit on to enjoy the proximity to the water (rather than from behind the recurve wall). These if constructed at 'Sprey Point' could help create a mid-scheme destination and be available for direct access to the water for SUP's, kayaks and swimming as well as for recreational angling. The incorporation of this type of feature would enhance safety aspects as well as having amenity benefits. The scheme fails to effectively replace/ replicate the current destination of Sprey Point. The proposed viewing area is not considered to be a strong enough feature to make a positive contribution to legibility in this location. A stronger feature should be created which should be an obvious destination.

### Beach Monitoring

Whilst the ES is required to contain details for appraisal of Coastal Processes and sediment movements, this should be accompanied with clear information on beach monitoring proposals, including trigger levels which would instigate consideration of recharge by Network Rail to replace sediment to maintain amenity function as well as protection for railway infrastructure, should significant losses occur post-scheme.

On behalf of Teignbridge District Council Cllrs [names redacted], together with the Coastal Officer and other specialist Officers, would welcome the opportunity to discuss any of the points above should any emphasis be unclear or clarification be required.

1. Parson's Tunnel to Teignmouth Resilience Project Overview for Public Consultation, revision 0.5 Jan 2020, p47

2. IEMA and ARCADIS Case study summary document

3. The TECP is an Integrated Coastal Management Partnership between the key statutory agencies and stakeholder groups with an interest in the management of the Teign Estuary and adjacent coastline between the Exe Estuary and the District boundary with Torbay. This includes the area open coastal frontage between Holcome (Smugglers Lane/Parsons Tunnel) and Teignmouth (Eastcliff) which is the subject of the above consultation. The TECP is led and hosted by Teignbridge District Council and includes as contributory partners the Teignmouth Harbour Commission, Associated British Ports (Teignmouth), Devon County Council, the Environment Agency and the Town Councils of Newton Abbot, Kingsteignton, Teignmouth and Dawlish. The Partnership functions through a Steering Group comprising the above and an independently appointed Stakeholder Representative.

4. Photo of Smugglers Lane as depicted on consultation model 20 Jan 2020

5. Photo of track and wall alignment approximately 200m from Eastcliff as depicted on consultation model 20 Jan 2020



## Parson's Tunnel to Teignmouth Resilience Project consultation – DWT comments

Thank you for the opportunity to respond to the consultation on the Parson's Tunnel to Teignmouth Resilience Project. Devon Wildlife Trust limits its comments to elements relating to biodiversity and related environmental issues.

### Sustainable transport and climate

DWT recognises the huge economic value that the mainline railway link provides to the south west. Public transport also has an increasingly critical role to play in reducing private vehicle use, reducing transport-related carbon emissions and encouraging active and sustainable travel. The climate emergency has brought this into sharp focus. However, the current emergency is one of both climate and biodiversity, with many of the solutions for climate change coming through restoration and re-creation of natural and semi-natural habitats. Proposals should seek to tackle issues around climate alongside securing nature's recovery.

### Net gain

We consider that the proposed project, including the mitigation measures put forward, will result in a net loss of biodiversity – please see the following six sections. The National Planning Policy Framework requires that the vast majority of development in the UK produce a net gain in biodiversity. Current policy proposals have set out the inclusion of a net gain requirement for all sectors within the upcoming Environment Bill, which is likely to come into force within the lifetime of this project.

DWT consider it is not acceptable for this project to seek only to mitigate losses of biodiversity but must move to providing a clear net gain for biodiversity from the outset.

### Impact on designated habitats

We consider that the proposed works are likely to have a significant effect on surrounding nationally and internationally designated wildlife sites, including:

- Exe Estuary SPA, SSSI, Ramsar Site, Important Bird Area
- Lyme Bay and Torbay SAC
- Dartmoor SAC
- Torbay MCZ
- East of Start Point MCZ

We recognise that the potential impacts on the majority of these sites has been recognised in the Scoping Report, but we would emphasise the importance and vulnerability of these sites in terms of their habitats and species. The permanent loss of seabird foraging habitat, affecting birds associated with the Exe Estuary, should be avoided and where this is not possible, offsetting options should be pursued.

### Impact on sub-tidal habitats

Local sub-tidal habitats are likely to be heavily impacted by sediment, boat movements and anchoring and potential changes in water movements. Wider coastal process are also likely to be affected. This must be thoroughly investigated, and steps taken to avoid such impacts. See below for impact on marine species.

There is a large area described as seagrass beds immediately alongside the site, based on grab sample results from 2005 which informed the 2010 DBRC Lyme Bay Biotope Map. While seagrass beds in the UK are usually associated with lower energy systems, this should be thoroughly investigated with maximum protection afforded any seagrass found. This also represents an opportunity for the project. Restoring and re-creating seagrass beds (if a feasibility study suggests this

is possible) could not only offer some suitable mitigation for habitat lost within the footprint of the project, but also seagrass beds offer some natural protection against storm activity, together with being a very effective carbon sink.

Annex 1 reef habitats are also present alongside the site at Holcombe, which will need protecting.

#### Impact on marine species

- The coastal waters of south west England are important for a number of marine mammal species, including a coastal population of bottlenose dolphin, a Lyme Bay population of white-beaked dolphin, with other dolphins, minke whale and grey seal regularly seen. Noise, vibrations and sediment are all likely to impact a wide area of Lyme Bay, affecting these species.
- Lyme Bay, including the area near the site, is a nursery area for inshore fish species, particularly mackerel. The sedimentation of seabed habitats, sediment plumes, noise and vibration are likely to impact these species.
- As recognised in the Scoping Report, Atlantic salmon and sea trout (and possibly European eel) migrations may be affected by noise, vibration and sediment. European eel will also potentially be affected by the new sea wall blocking access to the Holcombe Stream – this species is known to travel over other beaches in South Devon to access watercourses behind (e.g. Slapton).
- As recognised in the Sabellaria Report A02, Sabellaria in the locality will likely lose hard substrate habitat during the construction phase – although we recognise that potentially this will increase once the project is completed.
- Seabird nesting sites along the coastal cliffs of the site will be impacted during works and altered following works affecting species such as fulmar, great cormorant, shag, and herring gull.
- Seabird foraging habitat will be lost within the footprint of the site. As recognised in the Scoping Report, foraging habitat in the area will be impacted through noise, vibration and marine sediment affecting seabirds ability to forage, but also affecting prey species.
- Sensitive marine species protected under the Wildlife & Countryside Act 1981 including pink sea fan are found near the site (see marine explorer website). These are sensitive to sedimentation, boat traffic, anchoring and changes in water movements.

#### Impact on terrestrial species

The proposed works will also impact upon a wide array of terrestrial species, mainly through the impacts to the soft sandstone cliff areas. Species groups impacted include bats, birds, mammals, invertebrates, and plants. Soft cliffs are important habitats for a range of invertebrates as they offer burrowing opportunities. South Devon has a range of rare invertebrate species associated with soft cliffs and it is important that a full survey is carried out. Protection for rare species will be vital and opportunities for extending potential habitat will be important.

Devon holds several populations of endemic whitebeam (sorbus) species, often in isolated coastal cliff sites. Several sites are known in Torbay and Teignbridge. It is essential that surveys are carried out for this group of species and where any are found they are protected, and opportunities sought to expand their range. Many occur as a few individual specimens and these can represent the global population of the species.

#### Impact on freshwater species

Records show that European otter use the Holcombe Stream. Otters also frequently use coastal waters for both hunting and moving between watercourses. The new sea wall will block access to the Holcombe Stream for otters. As previously mentioned, this is also likely to affect European eel and even potentially migratory salmonids. The new sea wall should retain an opening suitable for the movement of otters and fish.

#### Permanent loss of habitats

Works will result in the permanent loss of habitats within the footprint of the project site including:

- Intertidal sediments – there will be a significant loss of intertidal habitats, particularly in the central section of the site, including the complete loss of intertidal sediments in the central area (even at low tide no sediment will be exposed).
- Beach – there will be considerable loss of beach habitat along the length of the site.
- Terrestrial habitats – the proposed buttressing to the soft sandstone cliffs using material reclaimed from the Isle of Wight offshore aggregate site represents a considerable loss of habitat. Losses will include a mix of bare sandstone and soil exposures, scrub, grassland and woodlands. As previously mentioned, these cliffs may contain rare species including endemic Whitebeam and invertebrates. The proposal describes an erosion mat being installed that encourages vegetation to grow and personal communications with Network Rail suggest the sowing of wildflower seed. We would suggest that this will require bespoke planting and sowing with bare patches of the original sandstone and associated soils retained. There will also be considerable disturbance to surrounding vegetation, affecting associated species.

We would expect this project to follow the mitigation hierarchy (avoid, minimise, mitigate) in trying to avoid damage to habitats and species, and only where damage cannot be mitigated onsite, and where a net gain cannot be achieved onsite, would we expect offsite mitigation to be considered.

In addition to the direct biodiversity impacts above, we comment on the following aspects of the project that may result in either potential failure of features and/or future biodiversity impacts.

#### Experience from Start Bay

Through discussions with Network Rail, we understand that there are proposals to include some areas of soft sediment around some of the hard revetments and that these will be planted. We would suggest that the project looks at previous experience from further south in Lyme Bay to understand the likelihood of success for these types of measures.

Slapton Sands in Start Bay has been a focus of works since severe storm damage in 2001. Attempts have been made to carry out large-scale beach replenishments and to build large shingle buttresses to protect areas of this shingle bar feature. However, these have rarely lasted more than a few months and on several occasions the entire works have been eroded in a single event of a few hours. Where hard structures are found alongside sediment areas, this leads to greater erosion.

We would suggest that planting on such areas will require a thorough evaluation from high energy systems where similar plantings have occurred previously.

#### Resilience against climate change

The proposed works have a suggested life expectancy of 100 years based on UK Climate Projections 2018 (UKCP18). However, the maximum track level rise of 1.21m is only 6cm over the UKCP18 high emission scenario for London in 2100. With the additional suggested intensity of storms, this makes a 100-year life appear optimistic. Providing the new line survives for 100 years, given the current route is 180 years old, and with continuing sea level rise, this project would appear to be only a temporary fix for a very long-term problem, which will have significant impacts. Will further environmental impacts be considered appropriate in another 100 years?

We would advocate a much longer-term plan that is costed against these very long-term projections and impacts.

#### Proposed jetty

The original proposals suggested the construction of a large jetty for the docking of aggregates ships to facilitate the bringing in of material from the Isle of Wight offshore aggregate site. We feel that such a large structure would have significant impacts on the seabed and associated habitats and could result in disruption to local marine currents, which may have consequences for coastal processes, sediment movements both immediately adjacent to the site and further afield. We could not support this.

#### Pollution

This project has a high risk of large-scale pollution of marine habitats through:

- Sediment movement and deposition both locally and through plumes moving this further afield.
- Noise and vibration which cause significant impacts in marine environments.
- Use of chemicals, fuels and concrete on a storm-prone shoreline over many years.
- Potential for breaches of the new line either during construction or once in operation. While this was always a risk, particularly through landslips, the bringing in of large quantities of material to construct the buttresses and backfill means there is an unknown impact of this new material on local habitats.

Yours sincerely

Conservation Manager  
Devon Wildlife Trust

Dawlish Town Councillors discussed the latest round of consultation at the Finance and General Purposes Committee meeting held on 27 February 2020.

They welcomed the fact that Network Rail are working to improve the resilience of the coastal railway. The committee recognises the importance of this line, not only to the entire South West, but also to our own coastal towns.

However, there are a number of concerns about the specifics of the design of the Parsons Tunnel to Teignmouth section, and the impact on the local environment and amenities. The Parish of Dawlish encompasses the section between the northern edge of Sprey Point and the Parsons Tunnel/Smuggler Lane, but the Council viewed the site as a whole and comment equally apply to the section within Dawlish and those within Teignmouth.

Serious concerns have been raised by communities across the resort towns of Dawlish and Teignmouth that the Network Rail project programme is flawed, and that an iconic piece of historic railway infrastructure - one of the most admired and photogenic sections of railway anywhere in the world - is to be altered beyond recognition through poorly conceived planning. Network Rail's project team has come forward with designs that are both sub-optimal and brutalist in design.

Without having access to an Environmental Statement (which would normally have been expected to be available for scrutiny as part of the formal TWAO consultation period) it would appear that insufficient weight and value appears to have been placed on environmental issues. The impact to the biodiversity, amenities, and in particular the beaches is unknown and very concerning. The quantum and degree of acceleration of loss of beach material that a higher seawall would generate through 'scouring' is also unknown, and Network Rail is yet to publish any meaningful details of coastal modelling that has been undertaken. Furthermore, evidence has yet to come forward to demonstrate that any consideration has been given to the safety of the public using the beach or waters adjacent to a higher, re-profiled structure bereft of safety features.

Some of the specific concerns include:

- There is little or no information on how the key issue in this section, that of drainage for the cliffs, is to be addressed. The cliff collapse in 2014 was not as a result of sea action, but a landslide from the rain not draining from the cliff. No details of how the cliffs and the proposed bund could be effectively drained, and where any discharge points would be located / interact with any residual beach, have been publicised.
- There is little or no mention of the impact of the proposed offshore pontoon or pier at Sprey Point for landing the volume of materials to build the bund.
- Access and safety issues at Holcombe involving an underground, unlit, canyon style passageway.
- The removal of the flat cycle path from Holcombe to Teignmouth which would have been a significant benefit of the plan.
- Concerns raised about how the work will affect the coastline in the wider area not just at Teignmouth and Holcombe.
- Lack of any indication of longer-term work to rebuild the beach using breakwaters or groynes to ensure that a new area of beach is established both providing amenity and protecting the railway line.

- Concern that the environmental impact assessment has not yet been done so cannot be commented on in the consultation. This must encompass shoreline and marine environment for biodiversity as well as the impact on the movement of sand and formation of beaches.
- Concern on the climate impact of the use of significant tonnage of concrete with the associated CO2 emissions.
- Lack of flexibility and extendibility of the design for future change considering the uncertainty of the sea level increase over the projected 100-year span.

Whilst Councillors acknowledge that changes have been made in response to feedback, they still feel that a great deal more can be done to achieve the best result.

Councillors unanimously agreed to request that a review be immediately undertaken in conjunction with local stakeholders and councils to consider all engineering options to defend the railway, improve public safety and to reduce the negative impact on local communities, businesses and the environment. The review could benefit Network Rail by delivering not only greater line resilience and service reliability, but by encouraging more members of the public to travel by rail for the enhanced experience our coastal railway resorts could offer.

We thank you for the opportunities to enable people to feed back on the plans.  
Yours sincerely

Town Clerk

I am writing, on behalf of Cycling UK, to object to the proposed works to the railway between Parson's Tunnel and Teignmouth, on the grounds that no provision has been made to accommodate cyclists.

The proposed works provide an important opportunity to provide a relatively flat cycle route between Teignmouth and Holcombe. This would support Devon County Council's policy to encourage active travel and to create an Off-road cycle route from Teignmouth to Dawlish, as part of the proposed Teign-Estuary Trail. This will form part of Sustrans Cycle Route 2 from Exeter to South Devon.

I understand that Devon County Council are considering an alternative inland route away from the coast. However, they have yet to publish any proposals for this route and the geography will dictate a climb of at least 100 metres out of Teignmouth. In contrast a relatively flat and appealing route could be included in the Network Rail proposals.

Yours Faithfully,

Cycling UK

## Parson's Tunnel to Teignmouth Resilience Project

The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CRoW Act). Its statutory remit is to give independent advice "as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area..." Section 94(4) of the Act specifies bodies to whom the Forum has a statutory function to give advice and this includes the Secretary of State for the Department of Transport.

The DCAF currently has fourteen members, appointed by Devon County Council, who represent the interests of landowners/managers, access users and other relevant areas of expertise such as conservation and tourism.

Members of the Devon Countryside Access Forum note the proposals to improve the resilience of the rail line between Parson's Tunnel and Teignmouth and recognise the importance of this. A working group was held on 10 February to consider access related elements and the following comments have been approved by the whole Forum. This response will be on the agenda for formal approval at the next meeting on 23 April.

The Forum has already produced two position statements relevant to this proposal; the first on greenspace and the other on disability access.

### Existing proposals

The Forum recognises the importance of greenspace and green corridors to health and well-being. The resilience project proposals accord with some of its green space aspirations and in particular:

1) The wider seafront promenade walk, part of the South West Coast Path, is supported. The Forum notes and welcomes the wider viewing area at Sprey Point and the incorporation of benches. 2) The inland path, linking to the seaward path, will provide a circular walk for walkers, dog walkers and those with mobility vehicles and buggies. 3) The rail crossing and ramped access will improve safety and access for those with disabilities. 4) The ramps connecting Smugglers Lane to Holcombe Beach will enable improved access to this area.

### Additional aspirations for improved access

Forum members made several observations and advises that these should be given further consideration at this early stage in the development process. There are opportunities to make further alignments to access and appropriate links.

a) Ramps connect to Holcombe Beach but there is no provision for disabled parking at the bottom end of Smugglers Lane. This would be a welcome addition in enabling disabled users to make full use of this additional access.

b) There is no ramped access leading to the beach at Sprey Point. This would not only improve access to this part of the beach for disabled users but also provide escape access to ensure disabled people are not cut-off at high tide. To minimise impact on the beach, the ramped access could be built into the revetment.

c) Additional escape access steps should be included in the plans.



d) The amenity area at Smugglers Lane could include seats and an interpretation/information board about the history of the area and development of the resilience project.

e) The Forum's aspiration is to encourage provision of access for the maximum groups of users. This is a costly scheme of which access is only a small element. In this context, the Forum advises that cycle use should be explored along the new landward path. This would enable cyclists, including family groups, to cycle and enjoy sea views. A widening of the path from the planned 3m should be investigated to see whether it is technically feasible without impacting on the beach, as well as whether a segregated route would be beneficial in view of the anticipated popularity of a shared-use route. Calming measures, such as rumble strips, could be put in place. The Forum is aware of safety considerations around shared-use and 3m would be insufficient to allow safe use or a divided path. Not permitting cyclists could mean that, for example, families with small children who could otherwise use small bikes/trikes would therefore not be able to enjoy the full walk, and this does seem a missed opportunity.

f) In conjunction with e) above, the provision of cycle racks would allow people to dismount and enjoy this area on foot. This would also encourage people to visit the area using more sustainable methods of transport.

g) Sensitive low-level lighting may be appropriate to enable maximum and safe use of the area, particularly by users with visual impairment who often holiday in one of the Teignmouth hotels catering for their requirements.

h) The aesthetics of the scheme, as viewed from open space and beaches, are critically important in terms of enjoyment.

### 3 Consultation process and general comments

The Forum would encourage involvement by young people in the consultation process, if this has not specifically been undertaken already.

It is hard to differentiate the full difference between what is there now and the current proposals and in particular impacts on the beach area at all levels of tide.

There does not appear to be any information on the impact of works on current recreational access to the area and how this will be addressed over the lengthy period of building work.

The Forum would encourage Network Rail to work with partners to ensure that travel links to the seawall from communities at both ends of the project are as sustainable as possible.

The Devon Countryside Access Forum would like to be kept informed as the plans develop and to be consulted on any access related proposals.

Yours faithfully

Forum Officer

Response sent on behalf of the Devon Countryside Access Forum

Chair:

Vice Chair: