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St. Mary's  
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04 September 2021

Ms Lisa Walton  
Planning Officer  
Council of the Isles of Scilly  
Town Hall  
St. Mary's  
TR21 0LW

**Re: Planning Application P/21/051/FUL Porth Hellick Beach**

Dear Ms Walton,

Thank you for the opportunity to comment on the above planning application. I am also very grateful to Dr. Swabey who met with me (and others) on site at very short notice and after office hours to discuss the project.

The stability and security of the Porth Hellick bank is of prime importance to me for a number of reasons. I hold agricultural fields in the SSSI to the north of the bank and I have a boat shed on the eastern side of the outer bay at Porth Hellick. Like previous generations of my family, I keep a boat at Porth Hellick which is often used for my work and like many other locals and visitors, I and my family greatly enjoy the area and spend a lot of time there. In my mind, Porth Hellick needs to remain a working beach, where leisure and commercial activities can continue to co-exist.

I am pleased that attention is being given to safeguarding this often over-looked area of St. Mary's, provided that any works are sensitive, sensible and fit for purpose. I support some aspects of the plan, but also have areas of serious concern. In addition, I am unfortunately naturally cynical towards projects of this nature as I feel that the last two "designed" sea defence works on Scilly have not proved successful – that is the works at Porthloo on St. Mary's and Perigilis on St. Agnes – in both instances, advice from locals was ignored.

The bank at Porth Hellick is an amazing example of a "living" natural and man-made sea defence, where the original shingle bank thrown up by the sea has been planted by far-sighted individuals with plants which bind and stabilise the bank. As a general observation, the bank is looking thicker, larger and healthier than I have seen it – particularly along the middle section of the beach. Nothing should be done to jeopardise or harm this, and I would strongly oppose any large-scale alteration to the existing bank. I have been reassured by Dr. Swabey that these proposed works will not involve major disturbance or alteration of the existing bank to the West of the Sir Cloudesley Shovell monument, other than to plug and re-vegetate the existing gaps along the bank.

There is no doubt in my mind that as things stand, the most vulnerable end of the bay is the eastern end. As a reference, I attach a photograph I took from the most recent over-

topping event which took place on 14 February 2014, taken at about high water (1640Z) with a recorded height of tide of about 5.3m.



The over-topping at the easterly end of the beach is clearly visible here, and had this gale occurred at the top of a large spring tide of 6m+, the situation would have been far worse, with potentially serious and long-term erosion of the bank in this area. Over-topping is however fairly rare with current climatic and sea level conditions – I think it has happened around six times in my memory from the mid-1980s.

I have divided my thoughts as below, based upon my understanding of the information provided in the planning application, and a clarification meeting with Dr. Swabey on site. It is highly possible I have misunderstood some aspects of the application and would be pleased to be corrected if so.

1. Raising the dune at the Eastern end of the beach:

From what I understand, this is the major element of the works and involves the creation and raising of the dune to the east of the Shovell grave marker. As stated above, I believe that this end of the beach is most vulnerable to over-topping. That much said, I am surprised at the proposed scale of the new dune, which is likely to be around 1 metre higher than the existing height and in excess of 15 metres wide at its eastern extremity.

This will radically alter the feel of the beach, and the vista from the very popular bench by the boat shed will be very different. In addition, not enough information has been given

about access to the boat shed, as the plan has the new dune encroaching onto the southern corner of the shed, and it just states that this will be “locally profiled”. The users of the shed must be reassured that their access will not be hindered or blocked by the project – either during the works or on completion by the new dune.

In addition, as far as I can see, no profiling or modelling has been carried out into the effect of the new dune on erosion elsewhere in the Bay. For example, immediately adjacent to the south-eastern corner of the proposed new dune is an undefended area which is currently eroding fairly rapidly. Research needs to be done to ensure that the new dune does not increase the rate of erosion in this and other areas before the work is agreed on.

## 2. Formalising access points and plugging gaps in the bank:

In terms of reducing erosion and promoting the health and stability of the bank, I feel that this is a good idea. On the plan, five sections of the bank west of the Shovell marker are set to be plugged and re-planted, and all access will be restricted to the eastern and western ends of the Bay. At present all of these “gaps” are used as pedestrian access points, and erosion in these areas is quite significant, especially immediately adjacent to the Shovell marker.

## 3. Suggested vegetation to re-plant the new dune and plug the old:

The plant which does the most to hold the bank together, withstand the sea and tolerate the harsh growing conditions is the *Fascicularia bicolour*, sometimes known locally as the pineapple plant. I was very pleased to see that this has been included in the proposed re-planting plan. However, on speaking with Dr. Swabey on site, he informed me that Natural England will now not agree to its use because it is “non-native”. If this is the case this is simply ridiculous – a significant amount of the flora Scilly is famous for is non-native and most of the wind-breaks and shelter belts consist of non-native species. The plant is already on site, doing a fantastic job and not spreading or encroaching on areas beyond the bank. Species such as Marram are nothing like as effective in a sea defence scenario – you need look no further than the recent Porthloo works for evidence of this. It would be reassuring to see the formal re-inclusion of the *Fascicularia* within any adopted plan and clarity needs to be sought from Natural England on this.

## 4. Ramp access over the new dune:

This I feel will have a huge visual impact. The proposed Dycel blocks which are to form the surface of the track are not attractive, especially when they are to be laid over the dune rather than through it. Although the plan includes the infilling of these blocks with topsoil and seeding with native grass species, it is highly likely this topsoil will wash out, especially lower down the ramp. Also, if the work is to be approved, is imperative that the proposed beach side concrete anchor beam is buried deeply enough not to get exposed, otherwise the potential for erosion here will be significant, and there maybe a drop at the end of the ramp.

I also have some serious concerns with the proposed strength of the access track. The Short Form Design Statement as a standalone document differs from the Short Form Design Statement included within the Site Information. In the Site Information Design Statement, it clearly states that the “...access ramp will not be designed to accommodate the launching of boats...”. It does not state this in the standalone document.

Any access track to the beach must be designed to withstand boat launching, vehicular access when required (including emergency services), equine access, bikes and pedestrians. At present, boat launching is limited to only one or two small vessels per year.

Aside from the structural question, if the dune erodes around the access track, leaving it standing proud, it really would look awful and be potentially dangerous. To mitigate this problem, and to reduce the overall visual impact, the access could cut straight through the dune with storm boards to put in place as required. In discussions with the other frequent beach users, we would be happy to set and remove these as required.

The area immediately behind the new dune is always wet in winter, as the water runs off the Downs to the east and has nowhere to go when it gets to the gateway by the shed. This is where the new track behind the dune is proposed to route. The design should include some drainage here – perhaps to direct any surface water into the adjacent leat. Without this, this area will remain very wet and boggy, and not suitable for a track.

Finally on this, the question of future vehicular access to the beach needs to be addressed. In the Short Form Design Statement (standalone document) it states on page two that in consultation with the client and the Duchy, "...it is no longer the intention of the Duchy that boats will be launched from the beach," and vehicular access to the beach will be limited only to those maintaining the outfall. I have emailed Luke Humphries, and he has assured me that this is not Duchy policy. However, this must be clarified by every party and communicated clearly to all beach users before permission is considered for the works.

#### 5. The construction of a boardwalk at the western end of the beach:

Although I agree with the formalising of access at this end of the beach, I cannot understand why there is a proposal to construct a boardwalk. This seems over complicated and entirely unnecessary, and probably would not survive the first gale and high tide. Despite reassurances from Dr. Swabey, it will make access difficult (if not impossible) for wheelchairs, horse riders and others. It will also require maintenance and will be mobile in height, so will require adjusting to the level of the beach. Whatever the final agreed design of the main access to the east should be replicated here, but on a smaller scale. I strongly feel the boardwalk idea should be totally abandoned.

#### 6. Existing access over the Downs to site:

The works will require a very significant amount of material to be transported to site. Dr. Swabey estimated this to be around 275m<sup>3</sup> - in excess of 400 tonnes. It is highly unlikely that this volume can be brought in by sea, and therefore will have to be brought in via the track over the Downs. This is already in a poor state, and constant traffic over a wet winter will make this impassable. It is therefore important that works are carried out to improve this access prior to, during and on completion of the project.

It is of equal importance that beach users (be they leisure or commercial) are given continual unhindered access during the works.

It is also my opinion that the track is too heavily trafficked at present, and the access route is in the poorest condition I have ever seen it. On completion of the project, consideration should be given to encouraging people to walk to the beach rather than to drive.

7. Overall ownership:

It is not clear anywhere in the documentation who will own the works on completion, and who will be responsible for the upkeep and maintenance. Maintenance would be significantly reduced by removing the boardwalk from the project, but there still needs to be a local body who oversees, monitors and rectifies the works if necessary. This must be formalised prior to the agreement of any works. For example, who will be liable in the event of a failure of the access track in the coming years?

8. Other minor works:

There are numerous small jobs around the Bay that require attention, such as the rebuilding of a small section of old sea wall under the westerly face of Dick's Carn (the Camel). It would be nice to see a basic survey undertaken of works such as these, and their inclusion within this project. These are minor works, and would not add much to the existing budget. If they are not done, they may well become major.

I would be pleased to discuss any of the above in greater detail and my thanks again for the opportunity to comment on the planned works.

Yours sincerely,

*[signed on original]*

Matthew (Ned) Rogers.