

**Meeting:** Cabinet Meeting

**Date:** 17 February 2026

**Wards affected:** All

**Report Title:** Implementation of the English Riviera Beach Standards

**When does the decision need to be implemented?** Upon conclusion on the call-in period.

**Cabinet Member Contact Details:** Councillor Adam Billings, Cabinet Member for Pride in Place, Transport and Parking, adam.billings@torbay.gov.uk.

**Director Contact Details:** Alan Denby, Director of Pride in Place, alan.denby@torbay.gov.uk

## 1. Purpose of Report

- 1.1. This report sets out the rationale for the implementation of the English Riviera Beach Excellence and Quality Standards (ERBS) as Torbay's locally owned beach quality framework replacing participation in the Blue Flag scheme. The report supports an operational decision and explains how the new ERBS framework provides a more appropriate, environmentally sensitive and cost-effective approach to beach management within Torbay.

## 2. Reason for Proposal and its benefits

- 2.1. Torbay Council, is implementing a bespoke two-tier beach quality framework designed specifically for Torbay's beaches.
- 2.2. The English Riviera Beach Excellence and Quality Standards provide a clear, transparent and locally accountable operational framework for beach management that reflects Torbay's unique coastal character and environmental sensitivities. This new framework puts local priorities first, focusing on water quality, cultural heritage, inclusivity and delivering an exceptional, welcoming experience for all beach users.
- 2.3. The Blue Flag scheme has become increasingly rigid, operationally restrictive and costly. It is imposing requirements that are impractical for Torbay and risks undermining the natural, unspoilt beauty of our beaches. In response, Torbay Council is moving to a locally defined framework that maintains high standards while enabling proportionate, environmentally responsible management and improved value for money.

### 3. Recommendation(s) / Proposed Decision

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- 3.1 That Cabinet approve the implementation of the English Riviera Beach Standards (ERBS) as Torbay's locally owned beach quality framework, replacing participation in the Blue Flag scheme.
- 3.2 That Cabinet agrees that ERBS will apply a two-tier recognition system (Excellence and Quality Standards) for eligible beaches, with Compliant Natural Beach designation for undeveloped sites.
- 3.3 That Cabinet approve the operational framework and assessment criteria as set out in the report, including baseline thresholds, scoring methodology, and annual review process and delegates to the Director of Pride in Place in consultation with the Cabinet member for Pride in Place any minor revisions required for the effective implementation of the ERBS.
- 3.4 Approve reallocation of the former Blue Flag accreditation budget (£11,000) towards practical improvements required to meet and exceed ERBS criteria.

### 4. Appendices

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N/A

### 5. Background Documents

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<https://www.torbay.gov.uk/democraticservices/documents/s127904/Destination%20Management%20Plan-22-27%20final%20consultation%20draft.pdf>

This Sets the strategic context for ERBS, aligning with priorities for quality, sustainability, and year-round tourism.

<https://www.torbay.gov.uk/council/policies/planning-policies/local-plan/local-plan/>

Provides statutory planning framework for place-making, environmental protection, and inclusive communities supported by ERBS.

<https://torbaystory.co.uk/>

Provides the overarching narrative for promoting Torbay as a place to live, work, visit, and invest. Embedding ERBS within this story reinforces civic pride and destination identity.

<https://static1.squarespace.com/static/55371ebde4b0e49a1e2ee9f6/t/65cdeae3c0cee32bf475dd2/1707993840562/Beach+Criteria+and+Explanatory+Notes+2024.pdf>

Used for comparison in the report to show where ERBS improves or replaces legacy requirements.

## Supporting Information

### 6. Introduction

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- 6.1. Torbay's beaches are central to the area's identity, economy, health and wellbeing. They support tourism, biodiversity, recreation and community life. While the Blue Flag scheme has historically offered recognition, its increasingly prescriptive requirements no longer align well with Torbay's diverse coastline, sensitive marine environments and operational realities. In response, Torbay Council has developed a locally defined framework that retains high standards while allowing proportionate, place-based management.
- 6.2. The English Riviera Beach Excellence and Quality Standards aligns closely with the strategic priorities of the English Riviera Destination Management Plan 2022 to 2030, which sets out the ambition to reposition the English Riviera as a high quality, sustainable and year round coastal destination. The Destination Management Plan places strong emphasis on improving the overall quality and consistency of the visitor experience, strengthening essential visitor services, enhancing the natural environment, and celebrating the area's distinctive sense of place through the UNESCO Global Geopark. The English Riviera Beach Standards directly support these priorities by providing a clear and locally designed framework that improves beach management, environmental protection, accessibility and the overall visitor welcome. In doing so, the Standards contribute directly to the Destination Management Plan's vision for a more competitive, resilient and environmentally responsible destination that reflects the English Riviera's unique coastal character.
- 6.3. These Standards also support the wider objectives of the Torbay Local Plan 2012 to 2030 by reinforcing its focus on place making, environmental protection, sustainable tourism, inclusive communities and long term economic resilience. By strengthening the management, presentation and protection of Torbay's beaches, which are some of the area's most important natural assets, the Standards help maintain high quality public spaces, support the visitor economy and contribute positively to community wellbeing.
- 6.4. To ensure fairness across very different types of beaches, the English Riviera Beach Standards apply a consistent assessment framework, but only beaches with the necessary access, facilities and management infrastructure are considered eligible for a Quality or Excellence Standard. Natural or undeveloped sites such as Watcombe and Hollicombe are therefore designated as Compliant Natural Beaches, recognising their high environmental value and excellent water quality without penalising them for the absence of infrastructure. These beaches remain within the assessment and monitoring framework to ensure ongoing environmental protection, but award thresholds and associated remedial action processes apply only to fully serviced, Standard eligible beaches where management interventions can reasonably influence the scoring.
- 6.5. To maintain a clear and proportionate minimum level of performance, the Standards include a baseline requirement for award-eligible beaches. Assessment scores are calculated as a percentage based on the total number of criteria met. Any Standard eligible beach that scores below 50% will be considered as not meeting the minimum operational baseline. A score below this threshold triggers the Remedial Action Pathway, requiring targeted corrective actions and a scheduled re-inspection within appropriate timescales. Beaches

scoring 50% to 64% remain eligible for the Quality Standard, while those achieving 65% or above receive the Excellence Standard. This approach ensures essential standards are maintained while recognising the different characteristics and operational realities of Torbay's diverse beaches.

## 6.6. English Riviera Beach Standards Framework

The framework is structured around six locally defined themes:

- Clean and safe bathing waters
- Natural environment and biodiversity protection
- Clean, well-managed and welcoming beaches
- Visitor experience and amenities
- Access, inclusion and safety
- Culture, heritage and local identity

## 6.7. Recognition Levels

**Excellence Standard:** For beaches achieving the highest standards in water quality, safety, amenities, and seasonal dog restrictions.

**Quality Standard:** For beaches offering excellent visitor experience, with good standards in water quality but with variations in amenities or dog access.

## 6.8. How ERBS Improves on Blue Flag

- The English Riviera Beach Standard framework strengthens core outcomes previously associated with the Blue Flag while refocusing beach management on locally determined priorities as listed below:
- Higher Water Quality Standards: The Blue Flag Criteria require a minimum of 5 water samples ERBS will deliver a minimum of 10 water samples during the bathing season and predictive pollution alerts in place by 10am on the day of the predicted pollution, exceeding Blue Flag's minimum requirements.
- Phasing of Enhanced Cultural, Heritage and Environmental Interpretation: New interpretive panels, digital content, and QR-linked information to tell the unique ecological and cultural story of each beach.
- Ambitious Sustainability Framework: Habitat-sensitive management tailored to seagrass, biodiversity and local conditions Biodiversity actions, smarter waste systems, stronger environmental management, and improved public education on waste, water safety and water quality. Launch of an annual water safety campaign in conjunction with RNLI and Tor Bay Harbour Authority.
- Committed to making our beaches fully inclusive, accessible and safe: Develop a program to transform into vibrant destinations by introducing facilities such as inflation stations, saunas, ice baths, and family-friendly lifeguard training centres for children to help build strong community hubs.
- Local Ownership and Governance: Creation of a formal Beach Stakeholder Forum involving key stakeholders to include businesses, operators, environmental and water safety groups.

## 6.9. Excellence and Quality Assessment Criteria

Assessment criteria include water quality compliance, enhanced monitoring, habitat sensitive monitoring, cleanliness, visitor information, amenities where appropriate, access and inclusion, water safety, dog management and local character as per table below:

Theme	Criterion	
Clean and safe bathing waters	Water Quality	Bathing water quality meets or exceeds Bathing Water Regulations 2013 standards, achieving at least 'Good' (minimum requirement for the Quality Standard) and aiming for 'Excellent' (minimum requirement for the Excellence Standard). A full four- year dataset is published on the Council's website, with Environment Agency updates displayed on applicable beaches and clearly communicated to the public.
Clean and safe bathing waters		Enhanced local monitoring is in place at Torbay's designated bathing waters, including in- season sampling, regular visual checks, timely updates displayed on the beach in the display board and pollution risk forecasts (PRFs) where provided by the Environment Agency. On site advisory signage is used to communicate any EA notices. The designated bathing waters in Torbay are as follows: Maidencombe, Watcombe, Oddicombe, Babbacombe, Ansteys Cove, Meadfoot, Beacon Cove, Torre Abbey, Hollicombe, Preston Sands Paignton Sands, Goodrington, Broadlands, Breakwater Beach (Shoalstone), St Mary's Bay. The Environment Agency samples designated bathing waters and publishes classifications Daily PRFs are issued only at a number of designated sites and therefore not every designated beach will have a PRF on any given day or season. ERBS therefore requires PRF signage and communications on beaches where EA provides a forecast for that site, alongside our routine local monitoring at all designated bathing waters.
Natural environment and biodiversity protection	Natural Environment	Beach managed in a habitat-sensitive way, avoiding damage to natural features and biodiversity.
Clean, well-managed and welcoming beaches	Cleanliness & Management	Beach and access points are clean, well-managed and appropriate to the scale and character of the beach.
Visitor experience and amenities	Visitor Information	Clear, accurate on-site information provided (safety, water quality, access, dog arrangements).

Visitor experience and amenities	Amenities (where appropriate)	Toilets, bins and facilities provided and maintained where demand and location make this appropriate.
Access, inclusion and safety	Access & Inclusion	Access arrangements are appropriate to the site, with clear information on routes and limitations.
Access, inclusion and safety	Water Safety	Risk-based water safety measures in place, including signage, equipment, education or partnership provision as appropriate.
Clean, well-managed and welcoming beaches	Dog Management	Dog access arrangements are clearly signed and managed in line with local policy (including seasonal restrictions where applied).
Culture, heritage and local identity	Culture & Local Character	Beach reflects local character and identity through presentation, interpretation or setting.

## 6.10. Annual Review of the ERBS Framework

The English Riviera Beach Standards will be reviewed annually to ensure they remain current, effective and aligned with best practice. As part of this review, all beaches will be reassessed, scoring will be updated, and the four-year water quality dataset will be refreshed. Any changes to criteria, baseline thresholds or eligibility will be approved through internal governance and communicated to stakeholders ahead of the next seasonal rollout.

The annual review will consider:

Water quality: Incorporate the Environment Agency's latest annual classifications (Excellent/Good/Sufficient/Poor) for all designated bathing waters.

Operational standards: Review in- season evidence (cleanliness, amenities, access & inclusion, water safety, interpretation/branding) and user feedback to refine proportionate actions for the next season.

Eligibility & thresholds: Reconfirm the ERBS recognition levels, baseline thresholds and award eligibility rules for Quality and Excellence, maintaining fairness across different beach types.

Who is involved

Environment Agency (EA): Provides statutory classifications.

Tor Bay Harbour Authority: Input on risk- based water safety measures, patrol models and seasonal safety campaigns.

Beach Stakeholder Forum: A formal group of businesses, operators, environmental partners and water- safety groups and local University that reviews, assesses and agrees the proposed beach standards, criteria clarifications, signage updates and operational adjustments ahead of each bathing season, ensuring local ownership and transparency.

Torbay Council (Beach Services; Director/Portfolio Holder): Review, finalises guidance and implements agreed changes for the new season.

#### Process and timeline

October–November (Evidence refresh): Beach Services collates EA annual classifications and compiles the operational evidence (inspections, incidents and user feedback).

Early December (Stakeholder Forum): Convene the Beach Stakeholder Forum to review the evidence for each beach, assess and agree the draft English Riviera Beach Standard assessments (Excellence, Quality or Natural Beach) for the forthcoming season, and to agree any minor updates to criteria wording and signage.

Mid- December (Governance sign- off): The Director of Pride in Place, in consultation with the Cabinet Member for Pride in Place and Director of Service approves minor revisions to the ERBS framework for implementation.

January–March (Implementation): Update English Riviera Beach Standard web pages and QR- linked content, adjust signage templates, and align external messaging with destination marketing for the coming bathing season.

#### 6.11. Blue Flag Criteria Comparison

The detailed review below confirms the English Riveria Beach Standard retains or enhances core blue flag outcomes. Certain infrastructure requirements are excluded due to incompatibility with Torbay's coastal conditions and sensitive marine habitats.

Blue Flag Criteria	Improve	Retain	Exclude
Criterion 1 Display Blue Flag programme details on the main beach information board, including season and contacts.	Improved board information: Introduce ERBS branded flags, QR codes linking to ERBS and specific page that provides detailed information on the beach	Yes	
Criterion 2 Promote at least five public environmental education activities each season.		Yes	

Criterion 3 Publish up-to-date bathing water quality results and explain what they mean for beach status.		Yes	
Criterion 4 Provide information about local ecosystems, sensitive areas, and cultural sites with a visitor code of conduct.		Yes	
Criterion 5 Show a clear beach map with boundaries, key facilities, access, zones and sampling points.	This is currently available on Torbay's main beaches increase implementation of new signage on other beaches	Yes	
Criterion 6 Display a beach code of conduct reflecting relevant laws for activities, animals, zoning, litter and vehicles.	.	Yes	
Criterion 7 Take and submit a minimum of five evenly spaced water samples per season at defined points ( $\leq 31$ days apart).	Torbay beaches have an increased sampling frequency to weekly in peak season. we already include predictive alerts signage for pollution.	Yes	

Criterion 8 Ensure independent accredited sampling and laboratory analysis, with a pre-set sampling calendar and history.	Publish a 4-year dataset online.	Yes	
Criterion 9 Prevent industrial or wastewater discharges from affecting the beach and inform the public of any intermittent outfalls.		Yes	
Criterion 10 Meet 95th percentile limits for E. coli and intestinal enterococci to achieve 'Excellent' classification.		Yes	
Criterion 11 Keep water free of oil and floatables; act immediately on abnormal physical/chemical changes.	Daily visual checks; oil spill response kit available along with trained responders.	Yes	
Criterion 12 Establish a stakeholder beach management committee to oversee	Set up a Beach Stakeholder Engagement Forum twice yearly.	Yes	

environmental compliance (guideline).			
Criterion 13 Comply with all applicable planning, environmental and coastal legislation for beach location and operations.		Yes	
Criterion 14 Consult experts and implement plans to manage nearby sensitive habitats and areas.		Yes	
Criterion 15 Maintain a clean beach, access paths and car parks, managing litter without harming flora and fauna.	Increased peak bin emptying in place. Daily beach and access path cleans already in place.	Yes	
Criterion 16 Leave natural seaweed/debris where possible, only removing when it poses a hazard or nuisance, and dispose responsibly.		Yes	
Criterion 17 Provide and maintain adequate, well-placed waste bins, adjusted for	Covered bins with anti-gull features in place; introduction of smart bins with fill-level sensors for	Yes	

peak use and local conditions.	real-time servicing initiated.		
Criterion 18 Offer facilities to separate at least three recyclable materials or seek dispensation if none exist locally.	Link in with SWISCo to focus on waste reduction campaigns and signage.	Yes	
Criterion 19 Provide an adequate number of toilets with clear signage; showers/change facilities encouraged.	Seasonal showers in place.	Yes	
Criterion 20 Keep toilet/restroom facilities clean with a frequency that matches visitor numbers.		Yes	
Criterion 21 Ensure toilet facilities have controlled sewage disposal (municipal connection or compliant on-site systems).		Yes	
Criterion 22 Prohibit unauthorised camping, driving and dumping; manage any		Yes	

permitted vehicles with clear by-laws and controls.			
Criterion 23 Strictly control access by dogs and domestic animals; assistance dogs excepted per law.	Clear dog control signs; changing from byelaws to PSPO's fines and public guidance.	Yes	
Criterion 24 Properly maintain all buildings and beach equipment to be safe, clean and environmentally appropriate.	Annual asset condition survey; safe systems for repairs; fence off works; record inspections.	Yes	
Criterion 25 Monitor nearby marine/freshwater sensitive habitats (e.g., seagrass) at least once per season with expert input.		Yes	
Criterion 26 Promote sustainable transport options (public transport, cycling, walking) and traffic management (guideline).	bike racks in place on many beaches look at increasing this; signposted walking links.	Yes	
Criterion 27 Implement public safety measures based on risk assessment,	We are currently in talks and engaging RNLI and Surf lifesaving club for discussions on	Yes	

<p>including lifeguards or public rescue equipment.</p>	<p>future sea safety on our main beaches as well as providing 6 weeks of Lifeguarding cover through Surf Lifesaving group for Torre Abbey next year; we have risk assessments for most of our main beaches &amp; propose increase this to include Goodrington.</p>		
<p><b>Criterion 28</b> Provide clearly signposted first aid—lifeguards, staffed stations, or accessible equipment—with qualified personnel.</p>	<p>Torbay Council provide first aid boxes to cafes or shops on seafronts for public use, this is signposted as well as public AEDs.</p>	<p>Yes</p>	
<p><b>Criterion 29</b> Maintain an emergency pollution response plan, contacts, public warning procedures, and flag withdrawal protocol.</p>		<p>Yes</p>	
<p>This criterion requires buoyed swim zones which would damage seagrass meadows in areas such as Torre Abbey. It also</p>		<p>This criterion requires buoyed swim and paddleboard zones which would damage seagrass meadows in areas</p>	

<p>mandates paddle craft zones and exclusion of 100m for motor craft. The setup cost is £72k with ongoing yearly costs of £26k, plus lifeguard patrols at £26k per beach for 6 beaches and £11k for the flag.</p> <p>These requirements do not fit Torbay beaches and would spoil the natural, unspoilt beauty of the coastline.</p>			<p>such as Torre Abbey. It also mandates paddle craft zones and exclusion of 100m for motor craft. The setup cost is £72k with ongoing yearly costs of £24k, plus lifeguard patrols at £26k per beach for 6 beaches and £11k for the flag.</p> <p>These requirements do not fit Torbay beaches and would ruin the natural, unspoilt beauty of the coastline.</p>
<p><b>Criterion 31</b> Provide safe public access and protect users with information, signage and maintained infrastructure.</p>	<p>We regularly inspect access routes; repair handrails/steps; and provide clear safety info; 5 knot markers implemented seasonally.</p>	<p>Yes</p>	
<p><b>Criterion 32</b> Make potable drinking water available on or near the beach (guideline).</p>	<p>Drinking water is available and is protected from animal contamination at signposted locations.</p>	<p>Yes</p>	
<p><b>Criterion 33</b> Ensure at least one municipal Blue Flag</p>	<p>We are improving our accessibility across our beaches</p>	<p>Yes</p>	

beach has accessible facilities for people with disabilities.	with beach with DDA compliant ramp and access matting at Goodrington, DDA compliant ramps and Changing Places WC at Paignton and wish to continue improve on access at Torbay Beaches over the next couple of years.		
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## 6.12. Blue Flag Comparison Summary

This table provides a high-level comparison between the former Blue Flag approach and the English Riviera Beach Excellence and Quality Standards. It demonstrates that the local framework retains or enhances core outcomes while allowing proportionate, environmentally sensitive and cost-effective management suited to Torbay's coastline.

Area	Blue Flag (Overview)	English Riviera Beach Standards
Water Quality	Seasonal compliance with international thresholds.	Enhanced local monitoring, increased sampling and predictive pollution alerts.
Environmental Protection	Standardised requirements, limited flexibility for sensitive habitats.	Habitat-sensitive management tailored to seagrass, biodiversity and local conditions.
Visitor Experience	Uniform international presentation.	Locally distinctive beaches reflecting culture, heritage and sense of place.

Safety & Management	Prescriptive infrastructure and zoning requirements.	Risk-based, proportionate safety measures aligned to beach characteristics.
Accessibility & Inclusion	Minimum compliance requirement.	Progressive improvement approach with inclusive initiatives and community access.
Cost & Value	External accreditation fees and fixed compliance costs.	Investment retained locally and directed to priority improvements.

### 6.13. What This Means for Residents and Visitors

For residents, the English Riviera Beach Excellence and Quality Standards provide confidence that Torbay's beaches are clean, safe, well-managed and protected for future generations. The locally owned framework prioritises environmental stewardship, accessibility and community benefit, ensuring beaches remain welcoming public spaces that support health, wellbeing and everyday enjoyment.

For visitors, the standards offer clarity, transparency and reassurance. Clear local branding, consistent information on water quality and safety, and an emphasis on visitor experience help position Torbay's beaches as high-quality destinations that reflect local character rather than a generic international template. The approach supports sustainable tourism by balancing enjoyment with protection of sensitive coastal environments.

### 6.14. Risk & Mitigation

Risk	Mitigation
Loss of international recognition	Strong local branding, clear messaging and destination marketing supported by ERBID and Torbay Council
Perception of reduced standards	Strong and clear upfront narrative explaining why ERBS is a better fit for Torbay than Blue Flag, including alignment with the DMP and Local Plan. Publish clear criteria, scoring percentages, eligibility rules and

	transparent reporting of annual results to reinforce credibility and maintain public trust.
Legal challenge re copying Blue Flag	Distinct structure, language governance model and assessment approach to demonstrate that ERBS is a uniquely local framework.
Stakeholder resistance	Early engagement through Beach Stakeholder Forum. Supported by consistent and proactive communication

## 6.15. Operational and Environmental Fit with Torbay Beaches

The increasingly stringent application and enforcement of existing Blue Flag criteria have introduced increasingly stringent requirements around beach zoning, mandatory buoyed swim and paddlecraft areas, extensive exclusion zones for motorised craft and associated lifeguard patrolling obligations. In Torbay, beaches are characterised by low gradients, extensive tidal ranges and sensitive marine habitats, including seagrass meadows. The installation of fixed or seasonal buoyed zones would require significant seabed disturbance, posing a risk to these habitats and detracting from the natural, open character of the coastline. These measures are therefore poorly suited to Torbay's physical and environmental conditions.

## 6.16. Conclusions

Blue Flag no longer reflects the operational, environmental or strategic realities of Torbay's beaches. A bespoke Torbay Beach Standard offers a more flexible, cost-effective and locally accountable approach, while maintaining high standards and public confidence.

## 6.17. Next Steps and Milestones

Milestone	Description	Target Date	Owners
Agree criteria and framework	Final agreement of ERBS structure, scoring, eligibility and baseline.	31 January 2026	Director
Discuss at Resorts Tactical Meeting	Present ERBS framework, confirm operational implications and timeline.	February 2026	Director/ Portfolio Holder/ Beach Services

Design & Produce ERBS Flags, Banners and Signage	Create visual identity, flags, banners, signage templates and digital assets.	February 2026	Beach Services/ Comms Team / ERBID
Stakeholder Engagement	Engage Members, community groups and seafront businesses to explain benefits and responsibilities.	February – March 2026	Director/Portfolio Holder/ Comms Team/ Beach Services /
Finalise Criteria and Guidance	Produce final guidance documents, briefing packs and implementation materials.	31 March 2026	Director/ Comms Team/ Beach Services /
Issue Press Release	Public announcement of the ERBS launch, including visuals, key messages and stakeholder quotes.	Early April 2026	Comms Team / ERBID / Beach Services
Align with Destination Marketing Strategy	Ensure ERBS messaging is embedded within destination marketing, visitor comms and promotional activity.	April 2026	ERBID / Comms / Beach Services
Develop Digital Platform	Update beach pages, add ERBS information, and publish water sampling results & datasets.	30 April 2026	Web Team / Beach Services
Annual Review Statement Added to Framework	Insert a formal commitment to an annual ERBS review, including scoring updates and dataset refresh.	May 2026	Beach Services/Director

## 7. Options under consideration

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### 7.1. Option 1 – Continue with Blue Flag Accreditation

Advantages:

- Maintains international recognition and a widely understood quality mark.
- Provides consistency with other UK coastal destinations.

Disadvantages:

- Increasingly prescriptive and operationally restrictive for Torbay's beaches.
- Requires costly infrastructure changes (buoyed zones, lifeguard patrols) incompatible with local conditions and sensitive habitats.
- Estimated cost: £72,000 initial setup + £191,000 annual pressure (lifeguards, maintenance, accreditation fees).
- Risks damaging seagrass meadows and natural character of beaches.

Why not chosen:

This option is financially unsustainable, environmentally harmful, and misaligned with Torbay's strategic priorities for flexibility and local accountability.

### 7.2. Option 2 - Withdraw from Blue Flag without introducing a replacement standard

Advantages:

- Immediate cost savings on accreditation and compliance.
- Removes operational restrictions.

Disadvantages:

- Loss of any formal quality assurance framework for beaches.
- Negative perception from residents, visitors, and businesses; reputational risk.
- No structured approach to maintain standards or drive improvements.

Why not chosen:

This option would undermine public confidence and destination marketing, leaving beaches without a clear accountability framework.

### 7.3. Option 3 Implement the English Riviera Beach Standards (ERBS)

Advantages:

- Locally owned, flexible framework tailored to Torbay's coastline and environmental sensitivities.
- Aligns with the English Riviera Destination Management Plan and Torbay Local Plan.
- Delivers higher standards tailored to Torbay's local requirements, ensuring water quality, accessibility, and visitor experience improvements that reflect the area's unique coastal character.
- Avoids costly and unsuitable infrastructure requirements.
- Investment retained locally for practical improvements (access, signage, biodiversity).

Disadvantages:

- Requires initial stakeholder engagement and branding work.
- Loss of international Blue Flag recognition (mitigated by strong local branding and communications).

Why chosen:

This option delivers a proportionate, environmentally responsible, and cost-effective approach while maintaining high standards and supporting Torbay's strategic vision.

## 8. Financial Opportunities and Implications

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- 8.1. In 25-26 the blue flag accreditation £11,000 it is envisaged that the expenditure will be reallocated into practical visible improvements to our beaches in order for them to meet and exceed the ERBS.
- 8.2. The forecast costs of retaining Blue Flag accreditation would have been significant. Blue Flag in 2026-27 would of required buoyed bathing zones, paddle-craft segregation, 100-metre motor-craft exclusion zones, and a fixed lifeguard model. For Torbay, this equates to an initial capital cost of £72,000, plus annual costs of £24,000 for maintaining the zoning infrastructure, £156,000 for mandatory lifeguard provision, and the £11,000 accreditation fee. This represents a minimum annual pressure of £191,000, in addition to the £72,000 one-off setup cost.
- 8.3. Maintaining the Blue Flag award would absorb substantial resources in infrastructure that does not align with Torbay's coastline, would negatively impact sensitive areas such as seagrass meadows, and would divert funding away from locally prioritised improvements.
- 8.4. By contrast, the English Riviera Beach Standards (ERBS) provide a more sustainable and locally tailored basis for investment. Rather than funding imposed buoy lines and fixed patrol

models, the ERBS framework enables investment to be directed into areas that matter more to residents, businesses and visitors, including:

- improved access and inclusive beach facilities
- enhanced cleanliness and smarter waste systems
- higher-standard water quality monitoring and public information
- environmental protection and biodiversity projects
- interpretation, culture and visitor experience
- more flexible, risk-based safety management
- community-focused amenities such as inflation stations and accessible facilities

While the avoided Blue Flag costs do not create additional funding, the ERBS framework will guide how we prioritise future investment, ensuring resources are focused on locally important improvements and long-term beach management.

## 9. Legal Implications

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9.1. The implementation of the English Riviera Beach Excellence and Quality Standards (ERBS) does not introduce new statutory obligations but must operate within existing legal frameworks, including:

- Bathing Water Regulations 2013 – ERBS maintains and enhances compliance with water quality standards set under UK and EU law.
- Environmental Protection Act 1990 – ERBS supports obligations for waste management and cleanliness on public beaches.
- Equality Act 2010 – ERBS includes accessibility and inclusion measures to ensure compliance with duties to provide reasonable adjustments.
- Marine and Coastal Access Act 2009 – ERBS aligns with habitat-sensitive management and protection of marine environments.

9.2. Intellectual Property Risk

- The report identifies a potential risk of legal challenge regarding similarity to Blue Flag criteria. This is mitigated by ERBS having a distinct governance model, structure, and language, demonstrating it is a uniquely local framework rather than a copy.

9.3. Byelaws and PSPOs

- Dog management and seasonal restrictions will continue to be enforced under existing Public Space Protection Orders (PSPOs) and local byelaws. No new legal instruments are required.

#### 9.4. Procurement and Governance

- Any expenditure on signage, branding, or infrastructure will comply with the Council's Financial Regulations and Public Contracts Regulations 2015.

### 10. Engagement and Consultation

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#### 10.1. Internal engagement:

- The proposal was developed in consultation with the Divisional Director of Place, Director of Place, Beach Services team, and Cabinet Member for Pride in Place.

#### 10.2. Stakeholder engagement:

- Early discussions held with the English Riviera BID (ERBID) Board, which unanimously supported the move away from Blue Flag and introduction of a locally owned framework.
- Engagement with Tor Bay Harbour Authority Harbour Master (HM) to ensure alignment with marine safety and operational considerations.
- Early Cabinet discussions showed support when shared by Cllr Adam Billings and Alan Denby, reinforcing political and strategic alignment.

#### 10.3. Results of engagement:

- Stakeholders welcomed the flexibility of ERBS compared to Blue Flag and its alignment with the Destination Management Plan and The Torbay Story.
- Feedback emphasised the importance of clear branding and communication to maintain public confidence and avoid perceptions of reduced standards.

#### 10.4. How proposals changed as a result:

- Incorporated a two-tier recognition system (Excellence and Quality) to ensure fairness across different beach types.
- Added Compliant Natural Beach designation for undeveloped sites following feedback about penalising natural beaches.
- Built in an annual review process to maintain transparency and credibility.

## 10.5. Next steps:

- Formal stakeholder engagement and public communications scheduled for February–March 2026, as outlined in the milestones section.
- Design and Comms Team, working in partnership with ERBID, will lead on the design and branding of ERBS to ensure strong visual identity and alignment with destination marketing.

## 11. Procurement Implications

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11.1. The proposal involves external spend for branding, signage, and promotional materials to implement ERBS. Procurement will follow the Council's Contract Procedure Rules and the Procurement Act 2023, ensuring opportunities for local suppliers and SMEs by considering lotting where appropriate. Social Value will be embedded by prioritising local economic benefit, sustainability, and community engagement in line with the Council's Social Value Policy and Community & Corporate Plan outcomes.

11.2. The Design and Comms Team will source suppliers through compliant routes to market, using competitive quotes for below-threshold spend and frameworks where applicable. No high-value or regulated threshold contracts are anticipated.

## 12. Protecting our naturally inspiring Bay and tackling Climate Change

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12.1. The proposal supports the Council's Environment and Carbon Neutral Policy and does not increase carbon emissions through major infrastructure or fleet changes. ERBS is designed to protect and enhance natural environments and biodiversity, with habitat-sensitive management and improved waste systems.

### 12.2. Key considerations:

- Carbon impact: Minimal – signage and branding have low embodied carbon and will use sustainable materials where possible.
- Biodiversity: Positive – ERBS includes actions to protect seagrass meadows and sensitive habitats, avoiding intrusive infrastructure such as buoyed zones required by Blue Flag.
- Transport: No additional motorised transport introduced; encourages sustainable access (walking, cycling) through improved information.

12.3. Climate resilience: Framework considers severe weather impacts and includes annual review to adapt to changing conditions.

12.4. Overall, ERBS strengthens environmental stewardship and aligns with Torbay's climate emergency commitments. No negative impacts identified; therefore, a full Climate Impact Assessment is not required.

## 13. Associated Risks

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### 13.1 Risks if the proposal is not implemented:

- Reputational risk: Torbay could appear to have reduced beach standards when Blue Flag awards are announced in May, impacting visitor confidence and destination marketing.
- Loss of strategic alignment: Failure to implement ERBS would undermine delivery of the English Riviera Destination Management Plan and The Torbay Story.
- Operational gap: Without ERBS or Blue Flag, there would be no formal framework for monitoring and maintaining beach standards, reducing accountability and consistency.

### 13.2 Risks associated with making this decision:

- Perception risk: Some stakeholders may view the removal of Blue Flag as a downgrade; mitigated through strong branding and communications.
- Legal risk: Potential challenge from Blue Flag regarding similarity of criteria; mitigated by ERBS having a distinct governance model and language.
- Delivery risk: Delay in implementing ERBS before the 2026 bathing season could weaken reputational benefits; mitigated by clear milestones and early procurement of signage and branding.

## 14 Equality Impact Assessment

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Age	<p>18 per cent of Torbay residents are under 18 years old.</p> <p>55 per cent of Torbay residents are aged between 18 to 64 years old.</p> <p>27 per cent of Torbay residents are aged 65 and older.</p>	Visitors may face mobility challenges; clear signage	Accessible paths and seating where terrain allows;	Beach Services – Ongoing
Carers	<p>At the time of the 2021 census there were 14,900 unpaid carers in Torbay.</p> <p>5,185 of these provided 50 hours or more of care.</p>	Carers may need accessible facilities	Accessible toilets and seating where feasible	Beach Services – Ongoing
Disability	In the 2021 Census, 23.8% of Torbay residents answered that their day-to-day activities were limited a little or a lot by	Some beaches are naturally inaccessible due to steep terrain	Provide accessibility info online and on signage; maintain accessible facilities where possible	Beach Services – Ongoing

	a physical or mental health condition or illness.			
Gender reassignment	In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same as their sex registered at birth. This proportion is similar to the Southwest and is lower than England.	Risk of exclusion if facilities/signage are not inclusive	Use gender-neutral signage where possible	Beach Services – Ongoing
Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership.	No adverse impact identified	N/A	N/A
Pregnancy and maternity	Over the period 2010 to 2021, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 63.7 per 1,000) than England (60.2) and the South West (58.4). There has been a notable fall in the numbers of live births since the middle of the last decade across all geographical areas.	No adverse impact identified	N/A	N/A

Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as white. This is a higher proportion than the South West and England. Black, Asian and minority ethnic individuals are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.	No adverse impact identified	N/A	N/A
Religion and belief	64.8% of Torbay residents who stated that they have a religion in the 2021 census.	No adverse impact identified	N/A	N/A
Sex	51.3% of Torbay's population are female and 48.7% are male	No adverse impact identified	N/A	N/A
Sexual orientation	In the 2021 Census, 3.4% of those in Torbay aged over 16 identified their sexuality as either Lesbian, Gay, Bisexual or, used another term to describe their sexual orientation.	No adverse impact identified	N/A	N/A
Armed Forces Community	In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces. In Torbay,	No adverse impact identified	N/A	N/A

	5.9 per cent of the population have previously served in the UK armed forces.			
<b>Additional considerations</b>				
Socio-economic impacts (Including impacts on child poverty and deprivation)	Deprivation in some areas	Cost barriers for beach facilities	Keep core facilities free; clear info on charges	Beach Services – Ongoing
Public Health impacts (Including impacts on the general health of the population of Torbay)	Health inequalities present	Encourage active lifestyles	Promote walking routes and beach activities	Beach Services – Ongoing
Human Rights impacts	N/A	Ensure equal access where reasonably possible	Compliance with Equality Act	Beach Services – Ongoing
Child Friendly	Torbay Council is a Child Friendly Council, and all staff and Councillors are Corporate Parents and have a responsibility towards cared for and care experienced children and young people.	Children need safe, inclusive spaces	Safe play areas and family-friendly signage	Beach Services – Ongoing

## 15 Cumulative Council Impact

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15.1 None identified.

## 16 Cumulative Community Impacts

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16.1 None identified