

Planning policy topic paper

Coastal Change



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Cover photograph: Aerial shot of erosion at Old Beer Road, Seaton

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Purpose of paper

This paper has been prepared to inform discussion of the approach to coastal change in the local plan. The paper deals with the principles involved rather than consideration of particular places. Evidence of the potential extent of coastal change for the whole of the East Devon coastline will be available early in 2022 and will inform the draft local plan.

The Council wears at least three 'hats' in terms of coastal change. As a coastal protection authority we are responsible for the delivery of beach management plans and any associated coastal protection works. As a local planning authority we need to plan for how we should adapt to coastal change. As a public body, and particularly through Members community leadership roles, we also have a duty to help affected communities understand the potential threats and take action.

This paper only deals with the decisions that we will need to take as a local planning authority through the development of a suitable approach to coastal change in the local plan.

1 Introduction

- 1.1 The coastline is a dynamic system being continually impacted by a range of forces and influences. Coastal change is the term used to describe any permanent physical change to the shoreline caused by erosion, landslip, permanent inundation (flooding) or coastal accretion. It is anticipated that climate change will create increasing pressure on coastal and estuarine environments through accelerating rates of sea level rise and an increased number of storms.
- 1.2 The East Devon coastline extends from Devonshire Head (just west of Lyme Regis) along the English Channel and up the Exe Estuary to the mouth of the River Clyst (west of Ebford). It includes beaches, often backed by steep rocky cliffs, together with estuaries and their important inter-tidal habitats. There are numerous environmental and heritage designations that include a World Heritage Site, a Ramsar Site, a Special Protection Area, Sites of Special Scientific Interest and Marine Conservation Zones. The East Devon coast is also home to many people and businesses, some of which could be vulnerable to the effects of coastal change. It is therefore important to understand the potential implications of this change and to plan for it.
- 1.3 A coastal change [briefing paper](#) was considered by Strategic Planning Committee (SPC) in [October](#) 2020. This paper set out the national approach and guidance on coastal change, which can be summarised as avoiding development in vulnerable areas and not increasing the rate of coastal change. The National Planning Policy Framework (NPPF) states that local planning authorities should identify a Coastal Change Management Area (CCMA) in any area likely to be affected by physical changes to the coast. The National Planning Policy Guidance (NPPG) states a CCMA should be defined where rates of shoreline change are

significant over the next 100 years, taking account of climate change. They will not need to be defined where the accepted shoreline management plan policy is to hold or advance the line for the whole period covered by the plan, subject to evidence of how this may be secured. Within CCMAAs, policies should make it clear what development will be appropriate and in what circumstances: provision should also be made for any development or infrastructure that may need to be relocated.

- 1.4 The Shoreline Management [Plan](#) (SMP) guides the planning and management of coastal defences and identifies areas of the coast for different approaches. These are:
 - no active intervention - no current plans to build any defence;
 - hold the existing defence line - maintaining current defences
 - managed realignment - allowing the shoreline to move to an agreed position
 - advance the line - new defences planned extending the land area out to sea
- 1.5 To complicate matters, the SMP is divided into three epochs: short term (0 – 20 years); medium term (20 – 50 years) and long term (50 – 100 years). The SMP policy can change between epochs, for example from 'hold the line' in the short term to 'managed realignment' in the medium term.
- 1.6 The broad approach of the SMP is to defend the centres of the main settlements and allow natural processes to continue in the rural areas. We also have areas of managed realignment. A map showing these can be viewed through a government [web site](#). We undertake more detailed work through [beach management plans](#), which plan for managing a beach at a local level for the purpose of flood and coastal erosion risk management
- 1.7 The October 2020 [SPC](#) considered plans, drawn by the University of Plymouth, to show how the eastern part of our coast (between the River Sid and our border with Dorset) may change over the next 100 years. Like the SMP approach, this draws lines to indicate potential short, medium and long term change (using the same time spans as the SMP set out above). This work was undertaken as a pilot study for a methodology to predict likely rates of coastal change in order to provide evidence for the designation of CCMAAs nationally. Details of the methodology are explained in the coastal change [briefing paper](#). To complete the evidence needed for coastal issues in the local plan, we are commissioning the University of Plymouth to apply the same methodology to the remainder of our coastline (from the River Sid to our boundary with Exeter City Council): this work is scheduled to be completed early in 2022. The focus of this briefing paper is to consider options for how our plan should deal with coastal change. A key part of this is to think about policies for what may and may not be appropriate in areas likely to change. We also need to consider how to facilitate the relocation of essential infrastructure and buildings/uses that may be affected by coastal change.

2 Review of best practice

- 2.1 When considering how our local plan can help our communities deal with coastal change it is useful to review how other planning authorities have approached the issue. Relevant policies are included in full in Appendix 1 of this paper.
- 2.2 In 2018 the Department for Environment Food and Rural Affairs (DEFRA) published a scoping [review](#) on adaptation to coastal change. This found that North Norfolk District Council and the East Riding of Yorkshire Council were the most advanced in terms of adaptation planning.
- 2.3 Since the DEFRA review, North Norfolk District Council have consulted on a new local plan that builds on their previous coastal policies. This defines CCMA's and prohibits any sort of new residential development within them (including conversions). Other uses may be acceptable, subject to a Coastal Erosion Vulnerability Assessment finding that there will be no increased risk to life or significant increase in risk to property, or that the development is temporary, for essential infrastructure/coastal works or is highly beneficial to the community. Even proposals in coastal areas but outside of the CCMA, need to consider and address the long term implications for coastal change. North Norfolk also have a 'roll back' (relocation) policy that allows some development within the CCMA to move to a location outside of the CCMA in certain circumstances.
- 2.4 At an average rate of two metres a year, the cliffs of East Riding have one of the fastest erosion rates in north-west Europe (some cliffs have receded by 20 metres in one year!). The draft local plan has a table which specifies what kind of development will be acceptable in a CCMA related to the projected lifespan of the application site. Where the site is likely to be affected by erosion within 25 years development is limited to temporary uses such as car parking or temporary tourism concessions (for example pop-up cafes). For the 25 to 50 year time horizon replacement of essential infrastructure for businesses may also be allowed. For the 50 to 100 year zone temporary development to replace existing permanent development may also be considered, including the relocation of residential properties and residential extensions would be likely to be acceptable.
- 2.5 The Waveney Local Plan includes a policy defining the CCMA where all planning applications for development need to be accompanied by a Coastal Erosion Vulnerability Assessment. In addition, the risk posed to supporting infrastructure such as essential transport links have to be considered. The policy is supported by a Development and Coastal Change Supplementary Planning Document. Policies for individual identified development sites in the Local Plan area include statements requiring a certain number of plots to be made available on the site for the relocation of dwellings under threat from coastal erosion with the provision that the plot should be used for affordable housing if it has not been used for the replacement of a dwelling at risk from erosion within a period of 5 years from the completion of the rest of the development.

3 Key issues to consider through local plan preparation

- 3.1 Key issues can be summarised as defining the CCMA and formulating policies for the CCMA.
- 3.2 Defining the CCMA
- 3.3 The work already undertaken by the University of Plymouth shows that parts of our coastline are likely to be affected by coastal change over the next 100 years. This means that CCMA's will need to be designated in our local plan and shown on the proposals map. The Plymouth work maps a 'worst case' scenario and includes a 10m buffer zone. Interestingly, in some parts of the coast already assessed, the Plymouth work shows a lower rate of erosion than the SMP and in other locations it shows a greater change. When the Plymouth work is completed, we will need to consider whether to adopt the precautionary approach of taking whichever line is furthest inland or whether to 'stick' with the University of Plymouth lines.
- 3.4 The Plymouth work includes an assessment of the extent of change likely in areas where the SMP policy is to hold the line, by modelling what could happen if those defences are not in place. The NPPG states that CCMA's will not need to be defined where the accepted shoreline management plan policy is to hold or advance the line for the whole period covered by the plan, **subject to evidence of how this may be secured**. In order to determine whether such areas should be included in the CCMA, we will need to be satisfied that the hold the line position can be maintained. More work will need to be undertaken on this issue before we can recommend an approach.
- 3.5 Formulating policies for the CCMA
- 3.6 We need to consider what policies we can use in the local plan to ensure that any development permitted would not exacerbate coastal change or result in unacceptable risks from coastal change.
- 3.7 A local plan coastal change policy should set out which uses are likely to be acceptable in our CCMA's. We will need to determine whether this will be the same for the whole CCMA or whether different approaches should be taken in different 'epochs'. This is the approach taken in the East Riding Local Plan set out above and has the advantage of clarity and imposing the greatest constraints on the areas at greatest risk. Should we need to include land protected under 'hold the line' within the CCMA we will also need to consider whether a different policy approach should be taken to other areas (with 'managed realignment' or 'no active intervention').
- 3.8 The policy approach could also be affected by other local plan policies, particularly development constraint policies in the 'countryside'. For example, we may wish to take one approach within any settlement boundaries defined and another in the 'countryside'. Policy scenarios setting out some of the options around this issue are set out in Appendix 2. More

work will be undertaken for the draft plan to set out a preferred policy and alternative options.

- 3.9 The question of whether the uses on land affected by coastal change should be allowed to relocate (or roll back) also needs to be addressed. This is allowed for in the current local plan through Policy EN25 – Development affected by coastal change (reproduced in Appendix 3). We could include a similar criteria based policy, but may also want to consider allocating land for such purposes or requiring a percentage of other allocations to be reserved for roll back (like the Waveney Plan).
- 3.10 Finally, any risk to essential infrastructure will need to be identified so that we can work with the responsible bodies to identify and facilitate changes.

4 Conclusions

- 4.1 We need to plan for coastal change in accordance with national planning policy and guidance. This involves identifying the areas at risk, identifying them as Coastal Change Management Areas and developing policies in the local plan to manage development and minimise risk.
- 4.2 We have already benefitted from the expertise of the University of Plymouth in identifying the areas at risk and this work will be completed early in 2022. This will provide a sound evidence base for the designation of CCMA's through the local plan.
- 4.3 We will need to devise policies through the local plan to guide what development will be appropriate in areas at risk of coastal change and to deal with any associated actions, such as facilitating roll back or safeguarding essential infrastructure. Our review of best practice indicates that policies controlling uses according to the level of risk (ie. more restrictions where change is anticipated in the short term) should be included in the local plan. Our adopted local plan has a policy on roll back and we need to consider whether to continue with or adapt our approach on this. When we have completed the evidence on which areas could be affected we will also need to identify any essential infrastructure that may be affected and plan accordingly.
- 4.4 Given the complexities of the subject and the potential impacts on communities it may be appropriate to develop supplementary planning guidance to support the local plan on our approach to and policies for coastal change.

Appendix 1 – Best practice policy extracts

East Riding draft plan (the link goes to the environment section – scroll down and then to the right and click on ‘environmental hazards’ and follow link to strategy document – page 190)

Coastal change

- E. Development likely to be affected by coastal change will be proactively managed by designating a Coastal Change Management Area (CCMA) on the *Draft Policies Map Update*.
- F. Within the CCMA proposals will be supported where it:
 - 1. Can be demonstrated that an appropriate temporary development, such as those included in Guide to appropriate development within the CCMA, will contribute to the local economy and/or help to improve the East Riding's tourism offer; or
 - 2. Would involve re-location or roll back of existing development to an alternative location, provided the existing development is in permanent use and is a permanent structure, or is an existing caravan or holiday home park. The alternative location should be a suitable coastal location; and
 - 3. Is ensured that:
 - I. the development is safe from the risks associated with coastal change for its intended lifespan;
 - II. the development does not have an unacceptable impact on nature conservation, heritage and/or landscape designations;
 - III. sites to be vacated as a result of relocation/roll back or expiry of a temporary permission, will be cleared and restored to a natural state, with net sustainability benefits and, where appropriate, public access to the coast; and
 - IV. the development has an acceptable relationship with coastal settlements in relation to character, setting, residential amenity and local services.
- G. Development proposals for sustainable coastal change management, including improvements to coastal defences or managed realignment, should have regard to the most up to date *Shoreline Management Plan* and the latest coastal monitoring information. Proposals will be supported where they would not have any unacceptable adverse environmental, social or economic impacts.

Table 15: Guide to appropriate development within the CCMA

Projected lifespan of application site	Examples of Appropriate Temporary Development
<p>0 to 25 years</p>	<p>Development within this zone will be strictly limited to temporary uses. Parts of this zone may be considered suitable for use for new and existing caravan parks, however, this should be linked to an agreed planned approach for adapting to coastal change in the future.</p> <p>Other examples of potential uses include the following:</p> <ul style="list-style-type: none"> • Assigning areas as touring pitches to remove hard development needed to support static caravans; • Temporary car parking; • Temporary tourism concessions (ice cream/pop-up cafes), supporting the local tourism offer and economy; • Temporary modifications to other existing commercial facilities, including fishing compounds may also be considered where a clear positive link can be made with the local economy; and • Nationally Significant Infrastructure, such as pipelines, that are related to off shore energy development and constructed to a standard that will not be impacted by coastal erosion. <p>The most seaward, clifftop portion of this zone would exclude all development and temporary uses to provide a safe buffer from the impacts of coastal erosion. The extent of the exclusion buffer would be based on the coastal monitoring data, and advice on proposals should be sought from the Council's Flood and Coastal Erosion Risk Management Team.</p>
<p>25 to 50</p>	<p>In addition to the development allowed in the 0 to 25 years zone, the</p>

years	<p>only development allowed will be replacement, relocation and adaptation of facilities and infrastructure deemed to be essential to support the continued operation of existing commercial/ business uses.</p> <p>Examples of potentially suitable uses in this zone include:</p> <ul style="list-style-type: none">• Adaptation of electricity, gas or sewerage infrastructure for existing sites;• Adaptation of access routes including roads and footpaths; and• Changes of use from permanent residential to other strictly limited temporary uses, including change of use to agricultural or tourism uses.
50 to 100 years	<p>Limited development may be considered within this zone. In addition to development allowed within the 0 to 25 years and 25 to 50 years zones, temporary development to replace existing permanent developments/properties may be considered within the 50 to 100 years zone. This would be conditional on the development being proposed to replace an existing permanent property/structure at risk from coastal erosion. The proposal would have to recognise that it was within the CCMA and its ability to be relocated in the future. The relocation of residential properties would not be excluded from this limited development. Extensions to existing properties and householder applications are likely to be acceptable in this zone.</p>

North Norfolk **draft plan**

Policy SD 11

Coastal Erosion

Within the **Coastal Change Management Area**, as defined on the Policies Map ⁽²⁵⁾, proposals for new residential development, including conversion of existing buildings, will not be permitted. For other uses, planning permission will be granted for development proposals subject to:

1. it being demonstrated through a **Coastal Erosion Vulnerability Assessment** that the proposal will not result in an increased risk to life, or a significantly increased risk to property; or,
2. the works are consistent with the relevant Shoreline Management Plan and there will be no material adverse impact on the environment or elsewhere along the coast; and,
3. the proposal comprises essential infrastructure including coast protection schemes; or,

4. proposals for temporary permission, directly related to the coast, of a temporary or impermanent nature together with, as appropriate, a legal agreement to secure the long term management potentially including the eventual demolition and removal of the development; or
5. proposals are for providing commercial, leisure or community infrastructure which provides substantial economic, social and environmental benefits to the community.

In any location, development proposals that are likely to increase coastal erosion as a result of changes in surface water run-off will not be permitted.

New development, or the intensification of existing development in a coastal location, but outside the Coastal Change Management Area, will need to demonstrate that the long-term implications of coastal change on the development have been addressed.

Policy SD 12

Coastal Adaptation

Proposals for the relocation and replacement of community facilities, infrastructure, commercial, agricultural and business uses affected by coastal erosion will be permitted in the Countryside, provided that:

1. the proposed development replaces that which is in the **Coastal Change Management Area** and is forecast to be affected by erosion within 20 years of the date of the proposal;
2. the new development is beyond the Coastal Change Management Area shown on the Policies Map ⁽²⁶⁾ and is in a location that is well related and accessible to the coastal community from which it was displaced;
3. the site of the development / use it replaces is either cleared and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate; and,
4. taken overall (considering both the new development and that which is being replaced) the proposal should result in no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.

Proposals for the relocation and replacement of dwellings affected by erosion will be permitted, provided that:

1. the development replaces a permanent dwelling (with unrestricted occupancy), which is within the Coastal Change Management Area and is forecast to be at risk from erosion within 20 years of the date of the proposal; and,
2. the new dwelling(s) is/are used as a primary residence;
3. the new development is beyond the Coastal Change Management Area shown on the Policies Map and is in a location that is well related to the coastal community from which it was displaced, and:
 - a. adjoins an existing group of dwellings;
 - b. the development does not result in an isolated form of development;
 - c. the development is in proportion to and respects the character, form and appearance of the immediate vicinity and surrounding area; and,
 - d. is consistent with other policies in the Local Plan.

If such a site is not available, the relocated development is within or adjacent to a defined **Selected Settlement**; and,

1. the site of the dwelling it replaces is either cleared, and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate. The future use of the site should be secured (by legal agreement) in perpetuity. Interim use as affordable housing will be considered beneficial to the well-being of the local community in interpreting this clause; and
2. taken overall (considering both the new development and that which is being replaced) the proposal should result in no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.

Waveney adopted [Local Plan](#)

Policy WLP8.25 - Coastal Change Management Area

The Coastal Change Management Area is identified on the Policies Map. Reputable and scientifically robust evidence that emerges over the lifetime of this Plan which effects the delineation of the Coastal Change Management Area should be considered when applying this policy.

Proposals for new, permanent residential development including conversion of existing buildings will not be permitted in the Coastal Change Management Area.

In parts of the Coastal Change Management Area expected to be at risk from change within a 20 year time horizon, only temporary development directly related to the coast, such as beach huts, cafés, car parks and sites used for touring caravan and camping will be permitted.

In parts of the Coastal Change Management Area expected to be at risk from change beyond a 20 year time horizon, other commercial and community uses will be permitted providing they require a coastal location and provide economic and social benefits to the local community.

Essential infrastructure, including transport infrastructure, utility infrastructure and wind turbines will only be permitted in the Coastal Change Management Area where no other sites outside of the Area are feasible and there is a management plan in place to manage the impact of coastal change including their future removal and replacement.

All planning applications for development within the Coastal Change Management Area and 30 metres inland should be accompanied by a Coastal Erosion Vulnerability Assessment which demonstrates that the development will not result in an increased risk to life or property.

Planning permission for all development within the Coastal Change Management Area will be time-limited according to the risk identified in the Coastal Erosion Vulnerability Assessment.

Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the relevant Shoreline Management Plan and there will be no material adverse impact on the environment.

Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

Proposals for the relocation and replacement of community facilities, commercial, agricultural and business uses affected by coastal erosion will be permitted in the Countryside, provided that:

- The proposed development replaces that which is within the Coastal Change Management Area as identified on the Policies Map and is forecast to be affected by erosion within 20 years of the date of the proposal;
- The new development is located at an appropriate distance inland with regard to Policy WLP8.25 on the Coastal Change Management Area;
- The new development is in a location that is accessible to the coastal community from which it was displaced; and
- The existing site is either cleared and made safe or put to a temporary use beneficial to the local community.

Proposals for the relocation and replacement of dwellings affected by coastal erosion will be permitted in the Countryside where:

- The development replaces a permanent building which is within the Coastal Change Management Area as identified on the Policies Map and is forecasted to be affected by erosion within 20 years of the date of the proposal;
- The relocated dwelling should be in a location which exhibits a similar or improved level of sustainability with respect to access to services and facilities as the original dwelling;
- The relocated dwelling is outside of the Coastal Change Management Area as identified on the Policies Map; and
- The existing site is either cleared and made safe or put to a temporary use beneficial to the local community.

Appendix 2 - Potential CCMA Policy scenarios

1. Land within CCMA within development boundary behind adequate defences
 - a) Allow new development as sites are defended (same as sites outside CCMA)
 - b) Allow new development subject to sequential and exceptions tests (same as outside CCMA)
 - c) Retain existing development but allow no new development
 - d) Retain less vulnerable uses but seek to relocate vulnerable uses
 - e) Retain existing development but seek to relocate emergency services and critical infrastructure (required in event of an emergency)
2. Existing residential development within CCMA (undefended)
 - a) Allow no new residential development (ie no new homes)
 - b) Allow no intensification of existing development (ie no extensions)
 - c) Any intensification of development must incorporate adequate resilience measures throughout development
 - d) Identify and safeguard new site for future relocation of homes
3. Existing economic development within CCMA (undefended)
 - a) Allow no new economic development (ie no new business premises)
 - b) Allow no intensification of existing development (ie no extensions)
 - c) Any intensification of existing development must incorporate adequate resilience measures throughout development
 - d) Identify and safeguard new site for future relocation of businesses
4. Existing tourism development within CCMA (undefended)
 - a) Allow no new tourism accommodation (ie no new premises, especially no caravans which are highly vulnerable use)
 - b) Allow no intensification of existing development (ie no new pitches on existing sites)
 - c) Any intensification of existing development must incorporate adequate resilience measures throughout development

- d) Any intensification of existing development must relocate existing pitches out of CCMA (where feasible)
- e) Identify and safeguard new site for future relocation of businesses
- 5. Existing key infrastructure within CCMA
 - a) Require adequate resilience measures
 - b) Provide improved flood defences to safeguard key infrastructure
 - c) Liaise with service provider to identify and safeguard new site for future relocation
- 6. Connectivity of main transport routes through CCMA
 - a) Safeguard land buffer for future relocation inland where feasible (eg coast path)
 - b) Raise levels of routes or provide bridges to maintain connectivity
 - c) Provide improved flood defences to safeguard key stretches of infrastructure to maintain connectivity
- 7. Temporary structures within CCMA (eg benches, hides, beach huts)
 - a) Identify and safeguard site for future relocation (if applicable)
 - b) Allow retention for as long as they last
 - c) Allow new provision and retention for less vulnerable or water compatible uses for as long as they last
- 8. Green Infrastructure
 - a) Support provision of land within CCMA to provide new green infrastructure for 'water compatible' uses
 - b) Identify opportunities to deliver new and enhance natural capital including biodiversity net gain, ecosystem services
 - c) Consider future use in relation to Nature Recovery Strategy and Networks

Appendix 3 – Policy EN25 of adopted East Devon Local Plan

EN25 – Development Affected by Coastal Change

Where there is robust evidence to demonstrate that permanent homes (with unrestricted occupancy) or community facilities, commercial or business uses that are considered important to coastal communities are likely to be affected by coastal erosion within 20 years of the date of the proposal, proposals for relocation/replacement may be considered favourably subject to the following criteria:

1. The new development is located in an area at less risk of coastal erosion;
2. The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, local amenity and any special landscape designations;
3. Overall, taking both the existing and proposed buildings into account, the proposal should not have an additional detrimental impact on the landscape, townscape or biodiversity of the area, taking into account any special designations;
4. The existing site is either cleared and restored with enhancements for nature conservation or put to use to benefit the local community within three months of the first use of the replacement. The future use of the site should be secured in perpetuity and provision made for public access to the coast where appropriate;
5. The development is consistent with the criteria set out in Policy S7 - Development in the Countryside; and
6. In the case of a residential proposal, the gross volume of the replacement dwelling is no larger than the one it is to replace.
