

Report to: Strategic Planning Committee

Date of Meeting 2 September 2025

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East Devon Local Plan – Coastal change management areas (CCMAs)

Report summary (and report details in full):

This report sets out information and recommendations in respect of where Coastal Change Management Areas (CCMAs) are defined, the justification for this and the policy relating to CCMAs.

The CCMA boundary defined in the 1st regulation 19 plan was largely based on work undertaken by the university of Plymouth. It was acknowledged that new national coastal erosion risk management mapping (NCERM) had been recently updated, but it was too late for this work to be taken into account at that time. The boundaries have now been redefined to generally account for both the University of Plymouth work and the NCERM. In the vicinity of Cliff Road in Sidmouth, the line is redrawn to align with new national coastal erosion risk mapping lines (though noting that these are similar to those shown in the 1st Regulation 19 consultation plan).

An interactive map showing the changes between the 1st regulation 19 plan and the CCMA now proposed is available at [EDDC Coastal Change Management Areas](#).

There are limited recommended policy wording changes to the CCMA area policy of the plan .

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee endorse the officer recommended changes to the CCMA boundary and related plan policy as set out in this report.

Reason for recommendation:

To ensure that the CCMA boundary is based on the most up-to-date evidence and the policy is appropriately worded.

Officer: Ed Freeman – Assistant Director Planning Strategy and Development Manager

Portfolio(s) (check which apply):

☐ Assets and Economy

☐ Communications and Democracy

- ☒ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☒ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☒ Place, Infrastructure and Strategic Planning
- ☐ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk; .

Links to background information Included within the body of the report.

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☐ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☐ Financially secure and improving quality of services

Report in full

Defining CCMA's

- 1.1 The emerging local plan seeks to define coastal change management areas (CCMA's) in East Devon for the first time, in accordance with national planning policy (paragraph 177 of the [NPPF](#) 2023, under which the plan will be examined). The first Regulation 19 consultation was accompanied by a [topic paper](#) that described how these areas had been defined. This was based on [evidence](#) produced for the Council by the University of Plymouth and, in the case of land in the vicinity of Cliff Road, on work undertaken for the Sidmouth Beach Management Plan (BMP). The topic paper noted that new national coastal erosion risk mapping ([NCERM](#)) had been published too late to be considered when the CCMA was defined and would need to be taken into account before the plan was finalised. One option highlighted was to use both the Plymouth work and the NCERM to inform the plan and to take whatever was the more landward extent of the area identified as being potentially affected by coastal change. In their representation on the local plan the Environment Agency recommended this as the appropriate course of action.
- 1.2 A number of other responses were made in respect of the CCMA, under Policy AR03: Coastal Change Management Areas (CCMA's), and can be summarised as follows:

Main Issues:

- Strong opposition from residents and landowners in Sidmouth, particularly Cliff Road, who argue that the CCMA is based on flawed or inconsistent erosion data.
(Individuals, local groups)

- Many claim the policy infringes on property rights and could lead to blight, reduced property values, and difficulty selling homes. (Individuals, local groups)
- Concerns that the policy does not account for the forthcoming Beach Management Scheme, which is expected to reduce erosion risk. (Individuals, local groups)
- The Environment Agency supports a precautionary approach using the most landward extent of available evidence. (Environment Agency)
- Calls for the policy to better reflect the need for environmental enhancement. (Devon Wildlife Trust)

Calls for:

- Reassess the CCMA boundaries using the most robust and locally specific data, including the Beach Management Plan. (Individuals, local groups)
- Include a commitment to review the CCMA following implementation of the Beach Management Scheme. (Individuals, local groups)
- Allow householders to extend or modify existing properties within the CCMA, subject to risk assessment. (Individuals, local groups)
- Clarify the evidence base and methodology used to define erosion rates. (Individuals, local groups)
- Include reference to environmental enhancement and biodiversity. (Devon Wildlife Trust)

1.3 The Coastal Change topic paper has been updated and is available with the agenda papers in a track changed format so that differences can be readily identified. The topic paper concludes that the CCMA boundaries should be defined by using both the Plymouth University and NCERM evidence and taking the most landward boundary to define the extent of the CCMA, in accordance with the advice of the Environment Agency. The only exception to this approach is in the vicinity of Cliff Road, Sidmouth, where it is recommended that NCERM be used to define the boundary. This designates a far smaller area of land than identified by the Plymouth work and is justified on the basis that key decisions on the beach management plan happened after the conclusion of the Plymouth work. The line is very similar to that shown in the previous consultation plan, which was based on the beach management plan, but using the NCERM mapping overcomes criticisms of the evidence underpinning the beach management plan. The approach taken to defining the CCMA is consistent with advice set out in paragraph 72 of the Government [advice](#) on flood risk and coastal change.

Policy text

1.4 Other criticisms related to the CCMA that the July Strategic Planning Committee wanted to be considered revolve around policy wording and whether it is reasonable in respect of householders wanting to extend their property.

1.5 Paragraph 178 of the [NPPF](#) (2023 version on which the plan will be examined) states that:

“Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:

- a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;
- b) the character of the coast including designations is not compromised;
- c) the development provides wider sustainability benefits; and

- d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast”.

The relevant government [advice](#) says:

What development will be appropriate in a Coastal Change Management Area?

Local Planning Authorities should ensure that strategic plans are sufficiently flexible to deal with changing circumstances in coastal areas, such as updates to relevant Shoreline Management Plans or sudden shifts in the protection afforded to a particular area.

General policy tests for considering development in Coastal Change Management Areas are set out in the National Planning Policy Framework.

Within this context, [essential infrastructure](#) may be permitted in a Coastal Change Management Area, provided there are clear plans to manage the impacts of coastal change on it, and it will not have an adverse impact on rates of coastal change elsewhere.

Ministry of Defence installations that require a coastal location can be permitted within a Coastal Change Management Area, provided there are clear plans to manage the impacts of coastal change. Where the installation will have a material impact on coastal processes, this will need to be managed to minimise adverse impacts on other parts of the coast.

For other development, the following may be appropriate, subject to the tests in the National Planning Policy Framework:

- Within the short-term risk areas (i.e. losses are expected within 20-years), a limited range of development directly linked to the coastal strip, such as beach huts, cafes/tea rooms, car parks and sites used for holiday or short-let caravans and camping – all with time-limited planning permissions;
- Within the medium (20 to 50-year) and long-term (up to 100-year) risk areas, a wider range of time-limited development, such as hotels, shops, office or leisure activities requiring a coastal location and providing substantial economic and social benefits to the community. Other significant development, such as key community infrastructure, is unlikely to be appropriate unless it has to be sited within the Coastal Change Management Area to provide the intended benefit to the wider community and there are clear, costed plans to manage the impact of coastal change on it and the service it provides;
- Existing buildings, infrastructure and land-use subject to the relevant planning permission could adapt and diversify to changing circumstances, where it reduces vulnerability, increases resilience and raises funds to facilitate subsequent relocation
- Permanent new residential development (including through change of use) will not be appropriate within a Coastal Change Management Area.

In all cases, there should still be careful consideration of the policies on development and flood risk, including [table 2](#)

Further advice on:

- [how a vulnerability assessment can be used to demonstrate whether development is appropriate in a coastal change management area](#)
- [permitted development rights in areas at risk of coastal change](#)
- [how neighbourhood plans and Neighbourhood Development/Community Right to Build Orders should take account of coastal change](#)

Advice is also available on [what approach should be taken to making provision for the relocation of development away from Coastal Change Management Areas.](#)

- 1.6 It can be seen that Policy AR03, in allowing house extensions in some circumstances, already goes further than either national policy or guidance. The local plan could just define the CCMA and say that development proposals will be considered in relation to national policy. Should members wish local plan policy to define potentially acceptable development in the CCMA, it is recommended that the following changes (in red, underlined font) should be made. The proposed changes make it clearer that the implementation of coastal management schemes will be taken into account when determining when coastal change can be expected. Additional clarity is provided for householder development. The change proposed to clause E will make the policy compliant with national advice. The final change relates to ensuring that the implications of surface water runoff are considered for applications in the CCMA and is in line with policy EN22 of the adopted local plan.

Policy AR03: Coastal Change Management Areas (CCMAs)

Within the Coastal Change Management Area (CCMA) defined on the Policies Map, proposals for new ~~dwelling~~residential development, including the conversion of existing buildings, will not be permitted.

Applications for ~~non-residential~~ development within the CCMA will be assessed in relation to the most up-to-date evidence available for when coastal change can be expected, taking into consideration the implementation of coastal management schemes, so that:

0-to-20-year time horizon - In parts of the CCMA expected to be at risk within a 0-to-20-year time horizon (2020 to 2040), only the following developments will be allowed:

- A. Temporary development directly related to the coast, such as beach huts, cafes, car parks or sites used for touring caravan and camping;
- B. Temporary modifications to other existing commercial facilities where a positive link can be made to the local economy;
- C. Mitigation measures for dealing with coastal change that are in accordance with the relevant coastal strategy; or
- D. Nationally significant infrastructure projects related to offshore development that are constructed to withstand the impacts of the expected coastal change.

D.E. Ministry of Defence installations that require a coastal location, subject to any material impacts on coastal processes being managed to minimise adverse impacts on other parts of the coast.

20-to-50 year time horizon

In parts of the CCMA expected to be at risk within a 20-to-50 year time horizon (2040 to 2090), in addition to the development allowed in the 0 to 20 years zone the replacement, relocation and adaptation of infrastructure, commercial and community uses will be permitted, providing they require a coastal location and provide economic and/or social benefits to the local community.

50-to-100 year time horizon

In parts of the CCMA expected to be at risk within a 50 to 100 year time horizon (beyond 2090), in addition to the development allowed in the 0 to 50 year zones, extensions to residential properties and householder applications may be acceptable if it is demonstrated that they will not exacerbate rates of coastal erosion.

All applications for development within a CCMA must show that it would not result in an increased risk to life or any property through the submission of a coastal change vulnerability assessment, which should be proportionate to the scale and nature of the development. Planning applications must also show that the surface water run-off implications of the proposal have been fully considered and found to be acceptable, including implications for coastal erosion.

Planning permission for all development in a CCMA will be time limited according to the risk identified in the coastal erosion vulnerability assessment.

This policy does not apply in the Cranbrook Plan area.

- 1.7 The policy was criticised for being unclear and for not allowing even small extensions, such as porches. This is not accurate because the plan does not seek to remove permitted development rights in the CCMA. Government guidance on removing permitted development rights in these circumstances states that local authorities should ‘consider this where it is likely to result in an increase in the scale of property or the number or vulnerability of occupants at risk from coastal change’.
- 1.8 Another criticism of the policy was that there were no lines drawn to show where the time horizons would apply. This is because any applications will be “assessed in relation to the most up-to-date evidence available for when coastal change can be expected” (third sentence of Policy AR03). This is a flexible approach that allows for changes, such as the implementation of a BMP that slows the rate of coastal erosion, to be taken into account. The policy word in has been amended to make it clear that coastal management schemes can be taken into account when assessing applications and that householder extensions would be likely to be acceptable (subject to the usual considerations) unless they are likely to cause increased rates of coastal erosion.
- 1.9 It should be noted that the new NCERM shows erosion projections for the years 2055 and 2105 under three different climate change scenarios, although the Shoreline Management [Plan](#) strategy approach is determined by three epochs (0-20 years, which is 2005 to 2025, 20-50 years, which is 2025 to 2055 and 50-100 years, which is 2055 to 2105). Presumably the 0-20 year epoch is reflected in the current shoreline position. The Plymouth [work](#) does indicate erosion rates in terms of 20, 50 and 100 years and would provide good evidence to inform the policy, in the absence of more up-to-date evidence. An alternative approach would be to combine the criteria for the 1-20 year and the 20-50 year epochs, although this would not reflect national guidance.

Financial implications:

There are no direct financial implications identified within the report. (AB/19/08/2025)

Legal implications:

There are no direct legal implications identified within the report (002533/20 August 2025/DH)