

## East Devon District Council – Draft Local Plan

### Response to public consultation – comments submitted on Policy 36 as contained within the draft Local Plan

**From:** Councillor John Loudoun, Ward Member, Sidmouth Rural

**Date:** 13 January 2023

#### **Policy 36 – Coastal Change Management Areas**

The coastal change management areas (CCMA) landward boundary is about 300 metres from the cliff that is parallel to Cliff Road, Sidmouth.

The CCMA landward boundary is the line to which the LPA estimate the cliff will recede in 100 years' time however, the equivalent 100-year recession line in the Sidmouth Beach Management Plan (BMP) is about 50 metres from the cliff that is parallel to Cliff Road. There is a considerable difference in where the draft Local Plan and the BMP draw this boundary. There is a considerable difference between these two boundaries and if the Local Plan's CCMA boundary is accepted over the BMP's boundary this will have a significant impact upon properties located in the vicinity of the cliff.

Within the draft Local Plan this 20-year line represents the boundary of the land that the District Council "expect" will be lost to erosion in 20 years' time.

I am unclear as to why or how the District Council can through the Local Plan and the BMP processes can identify two separate boundaries here. Given that the BMP is reaching a business case conclusion based upon the 50-metre boundary I would suggest that this is an already accepted boundary within the council and should therefore be applied within the Local Plan.

The draft Local Plan is proposing "*There should be no new residential development including conversion of existing buildings within 300m of the cliff that is parallel to Cliff Road*".

I believe that is not a sound proposal for several reasons, including:

- the mapping that is being used in this draft Policy is not the best available,
- the policy is not flexible because there are uncertainties in the mapping and this policy does not take them into account,
- the policy does not cover the provision future coastal defence works, as being determined within the BMP business case that will change the areas at risk from erosion,
- national planning guidance refers to "*expected losses*" (of land) in 20,50- and 100-years' time. This draft Policy does not explain what level of exception has been adopted for the draft Local Plan and the justification for it,
- It would also mean that any that property owners would not be allowed to upgrade or adapt their properties. This would have a negative impact upon property values and residents' ability to sell their properties. The impact would not just be for property owners in Cliff Road but also the immediate

surrounding area, apart from the planning implications, there is the question of the negative impact upon the properties in Cliff Road and the immediate surrounding area because the 100-year CCMA recession line is about 300 metres from the cliff, the 20 CCMA erosion line may well include the properties along Cliff Road. This could lead to the wider area including and beyond Cliff Road becoming a blighted area.