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1. Purpose of Paper

1.1 This technical paper seeks to set out the challenges facing our coastal communities as a result of likely changes to the coast and discusses the implications of this for planning policy in coastal areas. It builds on the work undertaken for the South Devon and Dorset (Durlston Head to Rame Head) Shoreline Management Plan 1, the Jurassic Coast World Heritage Site Management Plan 2, and the Dorset Coast Pathfinder Spatial Planning Research Project Final Report by Land Use Consultants 3.

2. Key questions

2.1 Is the ‘Preferred Options’ Draft Policy CS 32 adequate in view of consultation responses and emerging best practice?

2.2 What implications does the Shoreline Management Plan 2 have for spatial planning in East Devon?

2.3 How can the aims of the Jurassic Coast World Heritage Site Management Plan be incorporated into local planning policies?

2.4 Do we need to define Coastal Change Management Areas (CCMA’s)?

2.5 Can existing coastal defences be maintained/enhanced in ways that work better with natural processes/habitats while keeping the continuity of thriving communities?

2.6 What funds are available for maintaining existing defences and mitigating the impact of coastal change? Does the planning system have a role in securing funds?

3. Development of the Preferred Approach

3.1 Issues and Options Stage. In 2008/2009, the Council sought views on the Issues and Options consultation document. Although coastal issues were not specifically raised in this document a couple of responses highlighted concerns. The National Trust considered that more emphasis should be placed on coastal issues and sea level rise and that the LDF should seek to identify risk zones for flooding and coastal erosion. It was also felt that the LDF should identify where managed coastal realignment projects are needed and feasible. Exmouth Residents Association stated that their top priority was to put up sea defences to stop flooding from either sea or river.

3.2 Community workshops were held in the Spring of 2010 in the three main coastal towns to help develop the ‘Preferred Options’ report. In Exmouth climate change was cited as an

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1 South Devon and Dorset Coastal Authorities Group (SDADCAG)
3 Dorset County Council commissioned this study to consider the role of spatial planning in addressing coastal change along the Jurassic Coast World Heritage Site. It reviews the relevant policy framework and makes recommendations to both National government and local planning authorities on the Jurassic Coast on how the spatial planning system can best deal with dynamic coastal change. Pathfinder Project - Jurassic Coast
important issue. In Seaton it was felt that more information should be provided on local
climate change e.g. cliff surveys. The issues of removing the sea wall and building new
harbour walls were discussed but no consensus reached. In Sidmouth it was felt that the
Pennington Point cliff erosion needed to be ‘tackled’ and flooding issues considered.
Members of a local youth club took photos of things they liked and disliked: a picture of
falling down cliffs was put forward in the ‘dislike’ category.

3.3 Coastal Erosion in Preferred Options Document the preferred approach included a
specific policy – Draft CS 32 Coastal Defence Measures which stated 'The Council will
define areas where coastal defence measures are necessary, and where managed changes
are proposed, and means for securing their implementation'. It was noted that measures
and policy for managing the coast were set out in the Shoreline Management Plan, but
that work would be needed to refine the approach and where relevant to secure
developer contributions for coastal defence works.

3.4 Responses to Preferred Options
Natural England objected to Draft Policy CS 32 on the grounds that the need for or
location of coastal defences should not be set through the LDF. The National Trust
commented that the policy should be clearer and ‘Coastal Change Management Areas’
(CCMA) should be defined as set out in PPS 25 Supplement: Development and Coastal
Change. It should also deal with interim arrangements for managing the impacts of coastal
change before any CCMAs have been defined.

4. National Planning Policy context
4.1 The Flood and Water Management Act 2010, gave the Environment Agency a strategic
overview role for flood and coastal erosion risk management.

4.2 The National Flood and Coastal Erosion Risk Management (FCERM) Strategy was
published by Defra in association with the Environment Agency in September 2011. This
provides a statutory framework for the management of flood and coastal erosion risk.
This strategy describes what needs to be done by all involved in flood and coastal risk
management to reduce the risk of flooding and coastal erosion and to manage its
consequences.

4.3 Planning Policy Statement 25: Coastal Planning (March 2010) states the
Governments aim is ‘to ensure that our coastal communities continue to prosper and adapt
to coastal change’. This means that planning authorities should:

- Ensure that policies and decisions in coastal areas are based on an understanding of
  coastal change over time;

- Prevent new development from being put at risk from coastal change by;

  (i) avoiding inappropriate development in areas that are vulnerable to coastal
  change or any development that adds to the impacts of physical changes to the coast,

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This is based on Chapter 2 of the Jurassic Coast Pathfinder Spatial Planning Research Project – for fuller
details see report Pathfinder Project - Jurassic Coast.
(ii) directing development away from areas vulnerable to coastal change.

- Ensure that the risk to development which is exceptionally necessary in coastal change areas (because it requires a coastal location and provides substantial economic and social benefits to communities) is managed over its planned lifetime.

- Ensure that plans are in place to secure the long term sustainability of coastal areas.

4.4 Policy DCC3 (of the PPS 25 supplement) requires local authorities to identify areas likely to be affected by physical changes to the coast and refer to this area as the Coastal Change Management Area (CCMA). Local planning authorities should then set out the type of development that will be appropriate within the CCMA and allocate land within it for appropriate development. Where development and infrastructure needs to be relocated from within CCMAs, local planning authorities should make provision for sufficient, suitable land outside those areas, e.g. through rollback.

4.5 However, the status of PPS25 and its supplement is now uncertain, as the Government is reforming the planning system, including reviewing current national planning policy with a view to consolidating the existing policy statements, circulars and guidance documents into a single, short National Planning Policy Framework (NPPF) covering all forms of development and setting out national economic, environmental and social priorities.

4.6 The draft National Planning Policy Framework includes four pages on ‘Climate change, flooding and coastal change’, and advocates:

- the identification of Coastal Change Management Areas by local planning authorities;

- policies to make clear which and in what circumstances development will be acceptable in CCMA’s;

- provision for the relocation of development and infrastructure away from CCMA’s;

- considering granting temporary planning permissions (with restoration) in CCMA’s to ensure development is not affected by coastal change to reduce the risk to people and the development;

- allowing development in CCMA’s where it is demonstrated that:
  - development will be safe over its planned lifetime;
  - development will not have an unacceptable impact on coastal change;
  - the character of the coast, including designations, is not compromised;
  - the development provides wider sustainability benefits; and
  - The development does not hinder the creation of a continuous signed and managed route around the coast.

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Draft National Planning Policy Framework - Planning, building and the environment - Department for Communities and Local Government
5. The Shoreline Management Plan

Shoreline Management Plans are non-statutory documents setting out a large-scale assessment of the risks associated with coastal processes for the whole of the English and Welsh coastline, and policies for where to defend the coast from erosion. The PPS25 supplement encourages LPAs to ensure that they draw on SMPs to provide an evidence base at the appropriate scale and level of detail on the current and predicted impacts of physical changes to the coast to inform plan making. The South Devon and Dorset (Durlston Head to Rame Head) SMP provides a coastal management plan for the next 100 years and the policies for implementing it. Although the policies of the SMP have been formally adopted, this does not guarantee that funding will be provided to implement policies in the future.

5.1 The options for the SMP policies as defined by Defra are.

**Hold the line**: maintain or change the level of protection provided by defences in their present location.

**Advance the line**: build new defences on the seaward side of the existing defence line to reclaim land (the SMP contains no advance the line policies for the East Devon coast).

**Managed realignment**: allowing the shoreline to move backwards (or forwards) with management to control or limit movement.

**No active intervention**: a decision not to invest in providing or maintaining defences.

5.2 For detailed plans of the policies that apply to the East Devon coast please refer to the Shoreline Management Plan at [South Devon and Dorset Coastal Authorities Group (SDADCAG)](http://www.sdadcag.org.uk).

5.3 Relevant Extracts from the Shoreline Management Plan affecting East Devon

5.4 **Thorncombe Beacon to Beer Head**

This section of coast is characterised by dramatic, geologically important cliffs which are subject to large-scale complex landsliding. These events are difficult to predict with any certainty, making management of this shoreline difficult. Sediment interlinkages along this frontage are relatively weak due to the interruptions caused by headlands. The nature of the erosion of these cliffs is integral to their designations and landscape value, however the area is also important for tourism, with resorts at Seatown, Charmouth, Lyme Regis, Seaton and Beer heavily dependent upon this. **A key driver of policy is therefore to allow the continuation of natural coastline evolution whilst managing the risk of erosion and flooding to the key settlements.** At Beer, defences will reduce flood risk and retain beach material, as well as ensuring access to the shoreline continues to be provided for the benefit of the area's economy. Throughout this whole area the majority of properties and other assets will be retained with this plan. However, some changes will occur and potential for losses will exist. There is therefore a need for measures to be put into place to manage the relocation of people, property and infrastructure in the longer term. This area also includes the Axe Estuary. The long term plan here is to provide habitat creation through strategic
realignment, although consideration as to what happens to the route of the tramway would need to be made when implementing this policy.

5.5 Beer Head to Otterton Ledge.
This is a predominately undeveloped stretch of cliffed coastline, with one key settlement at Sidmouth. The cliffs are internationally important and their natural evolution is integral to their designated status. A key driver of policy is therefore to conserve the natural status of this shoreline, through minimising intervention, whilst recognising the importance of Sidmouth, and other small coastal developments, to the social and economic structure of the area. Accelerated cliff recession along the eastern part of Sidmouth is, in part, a result of the defences fronting the rest of Sidmouth further west. Erosion here will eventually lead to exposure of the defences on the River Sid and so increase the risk of flooding to the town. Beach management is therefore advocated to slow the rate of retreat and ensure that the risk to the fluvial defences in the River Sid is minimised. This would protect cliff top properties to the immediate east of the River Sid for a period of time, but these assets could ultimately need to be relocated away from the area of risk at some point if it becomes uneconomic to continue with this. Future decisions about this would be based upon continual monitoring of the beach and cliffs.

5.6 Otterton Ledge to Straight Point
This is a short stretch of shoreline lying between the headlands of Straight Point and Otterton Ledge and an important sediment feed from west to east exists which maintains the integrity of the spit at the mouth of the Otter Estuary. Although a naturally functioning coastal system is therefore a driver along this stretch, there is also a requirement for continued protection of Budleigh Salterton, a locally important tourist and service centre. The long term plan is therefore to defend the town but allow erosion of adjacent frontages to minimise impacts elsewhere. To the west of Budleigh Salterton, this plan may cause loss of some cliff top assets in the medium to long term, but will continue to provide sediment to the beaches fronting the rest of Budleigh Salterton towards the mouth of the Otter Estuary. Managed Realignment within the Otter Estuary itself offers habitat creation potential and may also be beneficial for reducing flood risk in other parts of the estuary.

5.7 Straight Point to Holcombe
This is a long stretch of coastline that encompasses the Exe Estuary, the large urban and commercial centre of Exmouth and the resort of Dawlish. Key drivers of policy here are the conservation of currently undefended areas, which have outstanding landscape and geological value, whilst ensuring the continued protection of important social and commercial assets. A key area of consideration is the protection of rail infrastructure. Future rise in sea level will also result in coastal squeeze in front of the defences and will result both in increased pressure on these defences and the loss of inter-tidal habitat. There are areas of opportunity, for example through Managed Realignment at The Maer, Lower Clyst and Powderham, which offer habitat creation potential. Any schemes would, however, need to determine how these can be implemented without adversely affecting the flood risk to people, property and infrastructure.
5.8 **Implications (of Shoreline Management Plan 2) for Property and Land Use**

For much of the East Devon coastline the preferred policy is to maintain existing defences where economically viable in the long term. This is to minimise loss of property and assets along the developed parts of the coastline as far as possible. However, for some sections of the coast, a change in management policy has been identified for the longer term where a Hold the Line policy is no longer acceptable on the grounds of economics, technical sustainability or the environment. The SMP has identified areas where a more naturally functioning coastline would be to the benefit of the natural environment, however, there are potential losses of assets should this policy be implemented. The key areas of management change are Ringstead, Hive Beach (Burton Bradstock), East Beach (West Bay), Seatown, Charmouth, **Branscombe**, Torcross, and Beesands, **where the long term technical sustainability and economic viability of a Hold the Line policy is questionable**. These management policy changes are based on comprehensive consideration of multiple factors, including scientific fact and best technical knowledge. In situations where communities may be affected, it is critical to manage expectations and account for resistance to implementation of these policies. As parts of the SMP frontage are very low lying, overtopping, overflowing or breaching of defences, even where flood defences are maintained, could lead to widespread flooding.

5.9 **Tourism and recreation is an important economic sector, with key centres located along the SMP frontage including those at Weymouth, West Bay, Charmouth, Lyme Regis, Seaton, Sidmouth, Budleigh Salterton, **Exmouth**, Dawlish, Teignmouth and Torbay. Along these frontages there will be losses of a number of properties as a result of policies to undertake realignment or No Active Intervention along parts of these frontages, as well as some re-routing of major infrastructure will be required in the longer term under this Shoreline Management Plan. While the preferred policy for many of these areas is to Hold the Line in the long term, there may be a detrimental impact on tourism through loss of beaches at places such as West Bay (West Beach) and Exmouth, where it will become increasingly difficult technically to retain beaches as sea levels rise causing coastal squeeze pressures. Along frontages where some properties will be lost due to coastal erosion in the medium to long term, the preferred policy includes provision for management of the retreat at some of these locations. This could allow for relocation or mitigation measures to be implemented should there be the mechanisms to do so.

5.10 The preferred policies of No Active Intervention or Managed Realignment have been recommended in areas where there are limited human assets or along areas of undeveloped coastline to ensure the preservation of the geological interests and compatibility with the Jurassic Coast WHS Management Plan objectives.

5.11 **Implications (of Shoreline Management Plan 2) for Amenity and Recreational use**

The coast is an important area for tourist and recreation use, with key interests concentrated along the coastal strip in many of the settlements in this area. **Under the preferred long term policies, the key centres of tourism and recreation such as at Weymouth, West Bay, Lyme Regis, Sidmouth, Exmouth, Dawlish, Teignmouth and Torbay**
will continue to be protected to maintain assets currently protected by the existing defences. However, this will be at the expense of beaches along many of these frontages, which are unlikely to be retained as the frontages become more prominent and therefore more exposed. The promenades along these sections will also become more exposed and less accessible. Where it is possible to provide defence sustainably in the long term through beach renourishment, this will be of increasing value to tourism and recreation within the region as more and more beaches become lost as sea levels rise.

5.12 Local planning should consider the risks identified in this Shoreline Management Plan and avoid approving development in areas at risk of flooding and erosion. Local planning also needs to consider that relocation of displaced people and property may require land to be made available within the same settlements to maintain the same level of community and may need to become increasingly flexible to enable this. Locations for new developments may need to be identified.

6. The Jurassic Coast World Heritage Site Management Plan
In 2001 the Dorset and East Devon coast was made a World Heritage Site (WHS) because of the international importance of the coast’s geology and geomorphology (extracts are shown in italic). In 2009 the UK Government published the 2009 to 2014 WHS Management Plan. Aim 1 of the management plan is:

“To protect the Site’s Outstanding Universal Value and integrity by allowing the natural processes which created it to continue.”

6.1 A key target to assess the success of this aim is given as the inclusion of policies for the protection of the WHS written into Local Development Frameworks document, but it is clear that integration of the WHS Management Plan into the planning system is not just about protection. “It is (also) about how WH Sites can play a significant role in the future sustainable development of an area and the life of the community. This is particularly important in Dorset and East Devon where the high quality environment and coast is such a valuable asset and strong driver for the tourism industry and broader economy.”

6.2 The Management Plan states that: “the most significant threat to the ‘outstanding universal value’ of the World Heritage Site is the creation of artificial structures along the coast that would affect the natural process of erosion and deposition ... typically... in the form of coastal defences to protect property or public infrastructure, although it could also involve marinas, harbours or jetties. The World Heritage Site is designated for its natural values and it is important that the processes that maintain those values, principally erosion from the sea, are allowed to continue unimpeded.

6.3 This position potentially conflicts with the desire and/or need to protect property that is at risk of coastal erosion, a conflict has been very publicly played out in East Anglia in recent years, with no clear resolution. With respect to the Dorset and East Devon Coast, the majority of the designated area is undeveloped coastline, with few properties or historic environment features that would be affected. Moreover, a significant proportion of the coast is hard cliffs, which do not immediately present problematic erosion rates. However, there
are a number of locations along the World Heritage Site which might warrant coastal
defences now or in the future, including on the edges of Sidmouth, Lyme Regis, Weymouth
and Swanage. These locations vary in their significance with respect to the values of the
WHS, so the impact of any potential coastal defences would need to be examined on a case-
by-case basis.

6.4 It is likely that there will be cases during the life of this Plan, and well into the future, where
public interest and the cost-to-benefit ratio is sufficiently positive that defences will be
justified. This reflects the need, under exceptional circumstances, to be pragmatic about the
short-term implications for the geology. In such cases any proposed scheme to defend the
coast would need to pass a wide range of tests as to whether it would be able to proceed.

6.5 These tests are summarised as follows:
• environmentally acceptable: natural processes should not be disrupted except where life
  or important man-made or natural assets are at risk;
• technically sound: a range of options should be considered and schemes should be
  sustainable and work with natural processes as far as possible;
• economically viable: the benefits of defending must be at least equal to the costs.

6.6 Should a scheme pass these tests, it would then be for the World Heritage Steering Group to
consider its view and comment if appropriate and, if the proposals are approved, strive to
ensure that the impacts on the OUV of the Site are minimised and mitigated as far as
possible.

6.7 Such cases also bring opportunities to explain coastal processes and the conflicts between
people and nature, and seek more sustainable planning policies other than the construction
of coastal defences”.

7. Discussion of Key Questions

7.1 Is the ‘Preferred Options’ Draft Policy CS 32 adequate in view of consultation
responses and emerging best practice?
Coastal management issues were identified as being important to our coastal
communities and the representations of Natural England and the National Trust raise
pertinent issues. The Jurassic Coast Pathfinder Spatial Planning Research Project report
notes that the ‘Preferred Options’ made very little mention of coastal management issues,
but that East Devon is now in a good position to consider introducing specific policies. In
view of these responses, national planning guidelines, the recently approved Shoreline
Management Plan and the challenges raised by climate change, it is felt that additional
policies (both strataegic and detailed) relating to coastal change should be included in the
Local Plan.

7.2 What implications does the approved Shoreline Management Plan have for spatial
planning in East Devon?
It is clear from the approved Shoreline Management Plan that there is a risk that
property could be affected by coastal processes within the next 50 years. Whilst this
may not occur within the lifetime of the plan, the nature of the geology is complex and
changes are unlikely to occur in a measured, predictable fashion. It is also clear from the Shoreline Management Plan that the attractiveness of our main coastal communities could be diminished, particularly through loss of beaches and the visual impact of ‘hard’ sea defences needed to ‘hold the line’ in the face of rising sea levels. Work with local communities on any ‘neighbourhood plans’ will need to consider the resilience of settlements to such changes and explore whether communities can work with natural processes to adapt to the changing environment.

7.3 **How can the aims of the Jurassic Coast World Heritage Site Management Plan be incorporated into local planning policies?**

It would be possible to incorporate the key aim of ‘protecting the outstanding universal value of the World Heritage Site by allowing natural processes to continue’ into a strategic local planning policy. This would clearly establish the importance of maintaining the WHS designation, particularly to the tourism sector of the economy. However, this would need to be balanced with the need to protect the safety and economic well being of coastal communities, provided that the implications of this for the World Heritage Site have been fully considered.

7.4 **Do we need to define Coastal Change Management Areas (CCMA’s)?**

Government policy (PPS25 Coastal Supplement and the draft National Planning Policy Framework) recommends that local authorities identify as Coastal Change Management Areas places likely to be affected by physical changes to the coast. Evidence provided in the approved Shoreline Management Plan suggests that small parts of Budleigh Salterton, Sidmouth, Branscombe, Beer and Seaton may need to be designated as CCMA’s, although further work is needed to identify exact boundaries. The predicted erosion zones shown in the approved SMP could be used as a starting point for defining the CCMA’s, although the boundaries may need to be widened to take account of properties indirectly affected, for example if access roads or associated curtilages are shown to be compromised.

7.5 **Can existing coastal defences be maintained/enhanced in ways that work better with natural processes/habitats while keeping the continuity of thriving communities?**

This issue would require additional work to audit existing defences and assess alternatives. Whilst this work may fall outside the remit of the Local Plan, the way our sea defences are maintained could have implications for how our towns look and function later in the plan period, particularly if sea levels rise.

7.6 **What funds are available for maintaining existing defences and mitigating the impact of coastal change? Does the planning system have a role in securing funds?**

More work is needed to understand this issue, but it may be appropriate to consider funding as part of the Community Infrastructure Levy work.