LDF Panel Meeting
Tuesday 13th September 2011
Undeveloped Coast Policy

Summary for Panel with Recommendations

A Key Issues

A1 Planning in the Coastal Zone is concerned with how the coast should be managed for the future, where development should be encouraged or restricted, and protecting the unspoilt stretches of coastline from inappropriate development. New government guidance requires the identification of the ‘undeveloped coast’ in order to apply policies at a local level. This report sets out the options in developing an evidence base to inform the preparation of the East Devon Local Development Framework.

A2 An alternative is not to have a policy but this would be contrary to best practice advice.

B Key Evidence

B1 We hold data and evidence on:

- GIS mapping of the Coastal Preservation Area
- East Devon AONB Management Plan (2008-2013)
- Devon County Council – Landscape Character Areas Profiles are due to be published very shortly – EDDC and AONB Officers have had input in this geographically specific character work
- World Heritage Site status – the working group is currently developing long-term Management Plans
C Strategic Options

C1 The identified options presented to Panel are:

1) To uphold the CPA policy (and defined area), which states:

‘Within the Coastal Preservation Area, development, other than that of a minor nature, will not be provided for except where it is required; for the benefit of the community at large, in connection with public access for informal recreation, or for the purposes of agriculture or forestry and only when such development cannot reasonably be accommodated outside the protected areas. Such development will only be provided for when it would not detract from the unspoilt character and appearance of the coastal area’.

2) To undertake a full reassessment of the Coastal Preservation Area using the methodology described within this technical paper.

D Recommendations for Policy

D1 A limited amount of development has occurred within the CPA since it was first established suggesting that the CPA policy is performing satisfactorily. Attention should be focused on those few areas where some development has occurred, namely the large holiday campsites: Sandy Bay, Ladram Bay and Branscombe.

D2 Discussions with a Devon wide Landscape Policy group, including Teignbridge and Dorset Landscape Officers have concluded that a consistent approach is best but that there is limited value in undertaking a full assessment of the coast. Undertaking some additional focused assessment work on specific developments which might threaten the ‘natural’ characteristics of the CPA is considered to be a more sensible approach.

D3 It is recommended that any review is considered on a site specific basis and should this be necessary a simplified version of the methodology described at the end of this document be developed to provide a cursory view on whether or not a further detailed examination is required.
The text below forms the start of a proposed technical working paper to inform and justify Core Strategy/Local Plan policy. The paper will be refined and worked on following LDF Panel consideration.

Purpose of Paper

This technical paper seeks to set out a brief background to Undeveloped Coast Policy and provide examples of Policy, the principles for defining undeveloped coast, a summary of the key landscape characteristics of the East Devon Coast and an assessment methodology template.

Planning in the Coastal Zone is concerned with how the coast should be managed for the future, where development should be encouraged or restricted, and protecting the unspoilt stretches of coastline from inappropriate development. New government guidance requires the identification of the ‘undeveloped coast’ in order to apply policies at a local level. This report sets out the options in developing an evidence base to inform the preparation of the East Devon Local Development Framework.
Key questions (note: some answers are provided at key points within the main report)

- What is the CPA and why was it created?
- Is the CPA in its current form sufficient for the Core Strategy?
- What methodology is available to re-assess the CPA?
- What are neighbouring Authorities seeking to achieve for their Core Strategies?

National Planning Policy context

The East Devon Core Strategy ‘Preferred Approach’ September 2010
Chapter 16 Climate change and the Environment – Coastal Zone
Preferred Policy Approach - Draft CS 31

The Undeveloped Coast in East Devon

Preferred Policy Approach - Draft CS 31

The Undeveloped Coast in East Devon

The Council will define an undeveloped coast policy area through the Core Strategy and put restrictive policy in place to limit development in this area that could damage this undeveloped/open status. This will be defined on the basis of visual openness and views of it to and from the sea. The boundary of the Coastal Preservation Area shown on the East Devon Local Plan will be used as a basis for informing area definition.

Development of Preferred Approach

LDF consultation events were held in Spring 2010 with representatives from local Parish Councils, adjoining Districts, agencies and the County Council. There was general support for preserving town boundaries to protect surrounding countryside but in some specific instances there were concerns that erosion will impact on residential properties, for example, east of Sidmouth (this work is covered by the Coastal Erosion Technical Paper).
What is the CPA and why was it created?

Devon County Council – Structure Plan (2001-2016)
The starting point for work is the current coastal policy in the Devon Structure Plan and East Devon Local Plan Chapter 4 Environment (4.23), which defines ‘Coastal Preservation Areas’. Coastal Preservation Areas are areas of land designated to safeguard Devon’s unspoiled stretches of coastline and estuary. They were first designated in Devon in 1966 in response to Government advice which required councils to define the undeveloped coast to safeguard the unspoiled stretches of the coastline (Circular 7/66). In 1985 a redefined CPA was adopted as part of the Landscape Policies Local Plan. Whilst CPAs are a Devon County Council designation, the detailed boundaries are defined within the Local Plans prepared by the various District Councils on the basis of two criteria carried in the County Structure Plan, i.e.

• The area should be substantially unaffected by development, and
• The area should be generally visible from cliff top, beach, sea or estuary, or form part of the view from significant lengths of an access road, public footpath or bridleway leading to the coast or from the long distance coastal footpath.

The CPA is not a landscape policy but a policy to protect the ‘finite resource of the undeveloped coast’ from development. Restrictions against development in CPAs are stronger than that for Areas of Outstanding Natural Beauty (AONBs). The current Structure Plan (2001-2016) Policy CO5 continues to protect Devon’s undeveloped coastline from inappropriate development by strictly limiting the type of development that should be located within the CPA. The policy states:

Within the Coastal Preservation Area, development, other than that of a minor nature, will not be provided for except where it is required; for the benefit of the community at large, in connection with public access for informal recreation, or for the purposes of agriculture or forestry and only when such development cannot reasonably be accommodated outside the protected areas. Such development will only be provided for when it would not detract from the unspoilt character and appearance of the coastal area.

What does National Planning Guidance and the Draft RSS say with regard to the CPA?

Regional Spatial Strategy (RSS)
The Draft Regional Spatial Strategy (Secretary of State proposed Changes July 2008) set out the requirement for local authorities to define the developed and undeveloped coast in Policy CO1 – Defining the Coastal Zone. Since the election of the coalition government in May 2010 the Regional Spatial Strategies have been identified for removal. Structure Plans have also been identified for removal by 2012. Policies relating to the coast will be included in Local Development Framework Core Strategies. For information, the Draft RSS policy
stated that within the undeveloped coast there will be a presumption against development unless it:

- Does not detract from the unspoilt character and appearance of the coast;
- Is essential for the benefit of the wider community; or
- Is required to improve public access for informal recreation; or
- Is required to support the sustainable management of fisheries; and
- Cannot be accommodated reasonably outside the undeveloped coastal zone.

**National planning policy guidance, PPG20 – Coastal Planning** (Sept 1992) recognises the coast as an important resource and the role of the planning system to reconcile development. For land based planning purposes the limit of the Coastal Zone in the seaward direction is mean low water mark. The inland limit depends on the extent of direct marine influences and coastal related activities. The matters to be taken into account in defining the coastal zone are set out in PPG20 para 1.7. **PPS25 Supplement – Development and Coastal Change** (March 2010) replaces PPG20 in part and requires ‘Coastal Change Management Areas’ to be identified. It proposes an integrated approach to coastal management in response to climate change including sustainable development of the coastal zone, avoiding inappropriate development in vulnerable areas. Appropriate development has to demonstrate that ‘the character of the coast is not compromised’. **PPS Planning for a Natural & Healthy Environment** is at consultation stage. It includes a policy on maintaining the natural character of the undeveloped coast, protecting & enhancing its distinctive landscapes. It is also concerned with cultural, biodiversity & geodiversity interest and public access. The coalition government now proposes a National Planning Policy Framework to replace individual PPGs & PPSs.

**The National Planning Policy Framework (NPPF) DRAFT states:**

“maintain the natural character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast32, and improve public access to and enjoyment of the coast;”

32 A Heritage Coast is a strip of UK coastline designated as having notable natural beauty or scientific significance.

However, a Practitioners Advisory Group commissioned by the Government recently published their suggested version of what the NPPF could look like and while the suggested draft produced by the practitioners does not necessarily reflect government policy, it does give an insight into what the framework might be like when it is eventually published by the Department for Communities and Local Government (a draft is due to be published this summer).

**Additional Policy support, legislation and documents –**

The **Marine and Coastal Access Act 2009** seeks to improve management and increase protection of the marine environment and improve recreational access to England’s coast. The Act requires Natural England to prepare a scheme to secure a long distance walking route around the open coast of England and will eventually result in a coastal access strip around the whole coastline, allowing National Trails like the South West Coast Path to be managed and realigned in the event of coastal erosion. Natural England estimates this will take 10 years to achieve nationally.
Other plans and documents to be considered within the Coastal Zone include Strategic flood risk assessments, Shoreline Management Plans and Seascapes Assessments. **Strategic flood risk assessments** consider the risk and impact from sea flooding, including changes in risk as a result of coastal processes and provide an evidence base for spatial planning. **Shoreline Management Plans** provide spatial information on physical changes to the coastline and options to manage them, again providing evidence for the Local Development Framework. **Seascapes Assessments** have been carried out in parts of England (inc Dorset), Wales, Scotland and Ireland. Natural England are developing the methodology to complement landscape assessment in England and a number of pilots have been carried out e.g. in the Severn Estuary. As well as offshore areas permanent water bodies such as the Exe Estuary would be considered.

**Implications of an Undeveloped Coast Policy for Property and Land Use (and value)**

Refer to Coastal Erosion Paper – also on the Panel agenda.

**Implications of an Undeveloped Coast Policy for Tourism and Recreation**

The policy will only support investment within these ‘undeveloped areas’ that are of appropriate in type (linked to marine use), scale and location (where no other location is feasibly possible). Assessment methodology will help determine suitability.

**Implications of an Undeveloped Coast Policy for developers**

Development proposals will need to meet the criteria set above and be sensitively designed so as to not impact on the natural environment.

**Implications of an Undeveloped Coast Policy for management of assets, including ownership, responsibility and liability**

Local planning should consider an Undeveloped Coast Policy to ensure this important natural asset is protected, conserved and enhanced. Management should continue to be undertaken sensitively and the LPA utilise other policies and strategies, including the AONB management Plans, WHS status and Green Infrastructure Strategy, Coastal Erosion, etc.

**Principles for defining the undeveloped coast**

Devon County Council prepared a Briefing Paper on Coastal Zone Policy in 2006 to assist the preparation of Local Development Documents. It suggests that the Core Strategy should set out a long term sustainable vision for the coast, adaptation strategies and define the coastal zone. In 2009 the Devon Landscape Policy Group agreed Draft Principles for defining the Coastal Zone, based on the criteria for defining Coastal Preservation Areas and PPG20. The group comprises representatives from Devon County Council, Devon District Councils and Unitary Authorities, Dartmoor National Park and Natural England. In terms of the ‘undeveloped coast’, the default or baseline is the current Coastal Preservation Area.

The limit of the Coastal Zone in the seaward direction is defined in PPG20 as mean low water mark, whilst the inland limit depends on direct marine influences and coastal related activities.

The Principles agreed by the Devon Landscape Policy Group for defining the Undeveloped Coast are as follows:
Defining the inward limit of the ‘Undeveloped Coastal Zone’ should be determined by:

a) The extent of direct maritime influences and coastal related activities, including the open coast and estuaries within tidal limits,

b) The visual envelope (visible from cliff tops, beaches, sea or estuary; or form part of the view from significant lengths of public highway, or other publicly accessible routes leading to and along the coast, including the South West Coast Path and the intended new coastal trail/access land) and,

c) The area being substantially undeveloped.

The current CPA boundaries should be used as a basis for defining the Undeveloped Coast. Any changes to the CPA/undeveloped Coast Zone boundary will require cross-working between districts to ensure a consistent approach in consultation with the Devon Landscape Policy Group.

The Character and Quality of the East Devon Coast

The varied coastline of East Devon includes the red sandstone cliffs with coves, beaches, headlands and rocky outcrops, resort towns of Exmouth, Budleigh Salterton, Sidmouth, Seaton with their farmed hinterlands and villages of Branscombe and Beer.

The East Devon District Landscape Character Assessment 2009 identifies a number of Landscape Character Types, which occur in one or more area:

- 1B Open Coastal Plateau e.g. Exmouth, Budleigh Salterton. between Sidmouth and Beer/Seaton and east of Seaton
- 1C Pebble Bed Heaths e.g. west of Budleigh Salterton
- 2B Coastal Scarp Slopes and Combes e.g. east and west of Sidmouth and west of Seaton
- 3A Upper undulating farmed and wooded slopes e.g. East and west of Sidmouth and east of Seaton
- 4A Unsettled Farmed Valley Floor e.g. Otter valley, The Byes and North of Sidmouth and north of Axe Estuary farmland rising to the east of the Exe Estuary
- LCT 4B Unsettled Marine Levels e.g. near Seaton and Budleigh Salterton
- LCT 4C Estuaries e.g. The Exe
- LCT 5 Coastal Cliffs e.g. Exmouth, Budleigh Salterton, Sidmouth, Beer and Seaton

Details of the Landscape Character Types, including key characteristics and management guidelines and recommendations can be found in the East Devon and Blackdown Hills AONBs and East Devon District Landscape Character Assessment 2009, available on the website: http://www.eastdevon.gov.uk/index/planning_services/planningpolicy-2/planning-ldf_evidence_base/planning-landscape_character_assessment.htm
Areas of Great Landscape Value are a local designation occurring Devon-wide and in East Devon and are areas of high landscape quality with strong, distinctive characteristics which make them sensitive to new development. The primary objective is conservation and enhancement. Government guidance has directed the removal of these local landscape designations and supported the development of the Landscape Character Assessment approach. East Devon District Council is well advanced with this assessment work - The East Devon District Landscape Character Assessment 2009 identified above.

Renewable Energies are potentially a threat within this zone and further work is ongoing as described in the Renewable Energy Technical Paper.
Discussion of Key Questions

- **Is the CPA in its current form sufficient for the Core Strategy?**

  The CPA in its current form is believed to be satisfactory for the East Devon District Council Core Strategy.

  A limited amount of development has occurred within the CPA since it was first established and any future work should focus attention on those few areas where some development has occurred, namely at the edge of existing settlements and large holiday campsites.

  A simplified version of the methodology described at the end of this report could be developed to provide a cursory view on whether or not a further detailed examination is required.

- **What methodology is available to re-assess the CPA?**

  The methodology for assessing the CPA has been attached at the end of this document. This information should be read in conjunction with the principles of defining undeveloped coast and the Landscape Character Assessment & Management Guidelines which have been described earlier in this report.

- **What are neighbouring Authorities seeking to achieve for their Core Strategies?**

  Both Dorset and Teignbridge authorities are generally satisfied with the CPA. Teignbridge have commenced some initial assessment work but have since put this on hold – this has been included at the end of this report.
The following pages have been incorporated into this report to provide extracts of current LDF documentation, example Policy and guidance which will be developed as part of the GI Policy Strategy work over the coming months.

North Norfolk Core Strategy - Adopted September 2008

Policy EN3: Undeveloped Coast

In the Undeveloped Coast only development that can be demonstrated to require a coastal location and that will not be significantly detrimental to the open coastal character will be permitted.

Community facilities, commercial, business and residential development that is considered important to the well-being of the coastal community will be permitted where it replaces that which is threatened by coastal erosion. Static and Touring Caravan and Camping Sites

3.4.40 Static caravan sites can have a significant impact on the landscape and this is particularly felt in the main resort areas of Cromer, Mundesley and Sheringham where a series of adjoining sites are prominent in an otherwise largely undeveloped coast. The Council has an aspiration to relocate these sites away from the cliff-tops, and therefore as an exception to the general presumption against new static caravan sites, they may be permitted where they directly result in the removal of an existing cliff-top caravan site to a site with a lesser landscape impact or away from an area at risk of erosion or flooding. Proposals permitted under this exception should seek to relocate to the 'rural' and 'resorts and hinterland' Tourism Asset Zone (Policy EC7), however on occasion it may be appropriate for an existing site within the North Norfolk Coast AONB to relocate to another site in the AONB that has less impact than the current site. In these cases the direct and indirect impact of the proposal must be carefully considered (the AONB Tourism Impact Analysis report found that tourism growth must be sufficiently controlled and managed to mitigate any negative impacts).

3.4.41 Touring caravan sites have a lower impact as they are not permanently occupied and in winter months there may be little evidence of activity. However in summer months they can be intrusive in the landscape and may add to visitor pressure on particular areas if not controlled. Therefore new sites will not be permitted within the Norfolk Coast AONB or Undeveloped Coast. Inland, where visitor pressures are less they may be suitable, subject to other environmental considerations.

Policy EC 10

Static and Touring Caravan and Camping Sites

New touring caravan and camping sites will not be permitted within the Norfolk Coast AONB, Undeveloped Coast or Environment Agency Flood Risk Zone 3. Elsewhere proposals will be judged against other Core Strategy policies. Temporary permission may be granted within the Coastal Erosion Constraint Area.
Coastal Zone

16.25 Although the Dorset and East Devon Coast (Jurassic Coast) World Heritage site status is justified on account of geological importance UNESCO did not note its landscape importance and the East Devon part of the site (for nearly all of its length) also lies in the East Devon Area of Outstanding Natural Beauty. National planning guidance places a requirement on the Council to define the undeveloped coast and the Local Plan currently shows a Coastal Preservation Area. We intend to rely on existing evidence and investment programmes for the Shoreline/Coastal Zone to manage this precious resource properly. Further investigation and assessments of the Coastal Zone for very specific areas may be undertaken should the need arise.

16.26 Circular 07/2009 on the protection of World Heritage Sites (WHS) states that appropriate policies for the protection and sustainable use of WHS’s including enhancement where appropriate, which supplement international and national policy and take account of the specific regional or local circumstances of a particular WHS, should be included in core strategies. Further, such policies should apply both to the site itself and, as appropriate, to its setting, including any buffer zone or equivalent. The WHS Management Plan does not define a buffer zone for the site as the wider surrounding area is already afforded strong protection through existing systems of protective designation, in particular the Sites of Special Scientific Interest, Area of Outstanding Natural Beauty and the Coastal Preservation Area.

16.27 The English Heritage guidance on the protection and management of World Heritage Sites (footnote paragraphs 7.3 and 7.4 The Protection and Management of World Heritage Sites in England CLG EH and DCMS 2009 and paragraph 10 of CLG Circular 07/2009) states that it is essential that appropriate policies enabling control of development in the setting of each WHS, including any buffer zone, in order to protect its Outstanding Universal Value, including authenticity and integrity, are included in the Core Strategy of the Local Development Framework.

16.28 Recent studies include assessment of the coastal zone area considerably further away from the shoreline than previously undertaken. This is to account for the potential increase in significant offshore and coastal energy schemes and the potential impacts caused.

Preferred Policy Approach - Draft CS 31

The Undeveloped Coast in East Devon

The Council will define an undeveloped coast policy area through the Core Strategy and put restrictive policy in place to limit development in this area that could damage this undeveloped/open status. This will be defined on the basis of visual openness and views of it to and from the sea. The boundary of the Coastal Preservation Area shown on the East Devon Local Plan will be used as a basis for informing area definition.
A methodology has been developed to ensure a consistent approach to Policy with neighbouring Districts (Teignbridge and West Dorset).

The following text is an extract of the Methodology for defining the Undeveloped Coast as described by the Landscape Policy Group (Devon wide - 2009) and recent Teignbridge District Council LDF work. This information should be read in conjunction with the principles of defining undeveloped coast and the Landscape Character Assessment & Management Guidelines (The East Devon and Blackdown Hills AONBs and East Devon District Landscape Character Assessment & Management Guidelines, follow link: http://www.eastdevon.gov.uk/index/planning_services/planningpolicy-2/planning-ldf_evidence_base/planning-landscape_character_assessment.htm

- The method for defining the undeveloped coast takes as a starting point the current Coastal Preservation Area. This section describes an appropriate methodology to undertake a full re-assessment of the current area and adjoining areas which currently fall outside the CPA against the principles described in section 2.

- A desk study to analyse the areas with direct maritime influences and coastal related activities was undertaken, including areas of floodplain & flood risk within the coastal flood zone. A number of these areas currently fall outside the CPA e.g. mudflats and coastal grassland along the Exe Estuary. A number of these areas also lie above the Mean Low Water Mark, the seaward limit of the Coastal Zone defined in PPG20.

- It should be noted that the administrative area of Teignbridge District and East Devon District stop at the Mean Low Water Mark. The permanent open water channel of the River Exe and falls within Crown jurisdiction. Nevertheless, it was considered that the channel, should be included due to its close visual relationship with the land on both sides of the Estuary.

- A computer generated visual analysis of the coast could be undertaken to help define the visual envelope. A series of points would be generated at 1km intervals, 1.5km out to sea and along both shore of the Exe Estuary to determine visibility from sea and estuary. The observer points were set at 2m above ground/sea level. The analysis uses a terrain model which does not take account of buildings, woodland, trees and hedgerows in determining visibility.
A further series of points were generated along principle publicly accessible routes leading to and along the coast to help define the visual envelope where visibility is not defined by views from the sea or estuary. For the purposes of this study, routes leading to the coast were considered to terminate within 1km of the shore. Visibility from these routes was considered looking towards the coast or estuary. An inland limit of approximately 4km was set. Land beyond 4km from the coast or estuary was considered to have limited coastal or maritime influences. Routes along the coast were considered to be approx. parallel with and within the 4km limit.

An analysis of the settlement boundary (Urban Residential Development Boundary, Village Envelope and Holiday Development Area) would be undertaken and land developed since the Adopted Local Plan 2006 would be excluded from the ‘Undeveloped Coast’.

A judgement is required to set the distance from the coast or estuary shore at which visible land cannot be described as ‘coastal’, where direct maritime influences and coastal related activities are not significant. The extent to which these criteria affect the landscape varies considerably depending on elevation and exposure. High inland ridges many miles from the coast can be influenced by the effect of salt laden winds, however they are not considered to form part of the ‘Undeveloped Coast’. For the purposes of this study the inland limit is judged to be approximately 4km from the coast or estuary shore. Therefore the inland limit of the ‘Undeveloped Coast’ varies considerably, the farthest limits lying at approximately 4km.

If field study work is to be undertaken it should be focussed on areas of land identified for potential inclusion and exclusion using information from the desk study, visual analysis and informed information gained from further consultation exercises.

An example map and table of results produced by Teignbridge District Council has been attached at the end of this paper. This information would need to be backed up by photographic evidence showing the justification for inclusion or exclusion according to the principles for defining the undeveloped coast. If changes are to be made it is good practice to digitise and produce GIS mapping of the data to ensure accessibility in a compatible format.

It should be noted that any computer generated visual analysis would not take account of buildings, woodlands, trees and hedgerows, and to be comprehensive field work based on views from roads, footpaths and other publicly accessible routes would need to be programmed. This means that some areas of land which are potentially visible based purely on terrain are obscured in reality.

It follows that woodland, trees and hedgerows visible from sea or estuary should be included since these are landscape elements which form part of the ‘Undeveloped Coast’. Land falling behind these features which would otherwise be visible should be included since the features are not permanent and generally have no specific protection under law.
o Buildings on the other hand are more permanent features and are rarely cleared and replaced with open land, except perhaps in cases of coastal erosion. Whilst individual and small groups of buildings and other developments may be ‘washed over’, larger settlements and other significant areas of developed land (e.g. Ladram Bay and Sandy Bay Holiday Sites are excluded.

o Land obscured behind buildings along a settlement boundary should in theory therefore be excluded. The limits of field work, however, mean it would not be feasible to survey all land potentially obscured behind the settlement boundaries. Previous mapping of the CPA mapped to a recognisable feature e.g. a field boundary, resulting in small fields or parts of fields being included within the CPA when they were obscured by buildings. This approach has been followed through in defining the ‘Undeveloped Coast’.

o Mapping to a recognisable field boundary is a pragmatic approach which is in general terms effective. In some instances, however, large fields which cross ridges and summits or vary dramatically in elevation clearly have visible and non-visible areas. In these cases the limits of the ‘Undeveloped Coast’ would be effectively defined by contours.

o Where land is not visible from sea or coast but potentially from significant lengths of a publicly accessible route, views may frequently be obscured by hedges, banks, trees or woodland or indeed buildings along the route. Land which is not visible from significant lengths is excluded, taking into account whether the view from the route is obscured by vegetation, banks or buildings along the route itself. The exceptions to this are where land is under direct maritime or coastal influence, small areas included for mapping purposes or pockets washed over within a wider area.

o Within the CPA pockets of land e.g. in deep valley bottoms which were not visible but fell within a larger visible area were ‘washed over’, rather than leave ‘holes’ in the CPA. This approach has been followed through in defining the ‘Undeveloped Coast’
Plan produced by Teignbridge District Council to assess the undeveloped coast methodology. The table on the next page indicates Draft Coastal Preservation Area/Undeveloped Coast Proposed Boundary Changes and the justification for any change.
## Coastal Preservation Area/Undeveloped Coast Proposed Boundary Changes

* denotes Inclusion site in Local Plan First Review Initial Deposit Version 2001  
! denotes Inclusion in LDF Core Strategy 2006

### Inclusions

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<thead>
<tr>
<th>Area No.</th>
<th>Parish</th>
<th>Area Description</th>
<th>Justification</th>
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<tbody>
<tr>
<td>CI 1</td>
<td>Kingsteignton/Teigngrace/Newton Abbot</td>
<td>Land at Vicarage Hill, Hackney Marshes, River Teign &amp; Newton Abbot Race course</td>
<td>Visible from estuary &amp; PROW (Templer Way &amp; footpaths at Hackney Marshes), public highway (A380 &amp; Hackney Lane), direct marine/coastal influences (Teign is tidal, coastal flood plain). Outside settlement boundary.</td>
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<tr>
<td>CI 2* ! (part)</td>
<td>Haccombe with Combe</td>
<td>Land south of the Teign Estuary and east of Newton Abbot</td>
<td>Visible from estuary and public highways (A381, Ridge Rd)</td>
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<tr>
<td>CI 3* !</td>
<td>Bishopsteignton</td>
<td>Land between Ashill &amp; Combe Way (opposite Whidborne Mews)</td>
<td>Part of field outside settlement boundary, not visible from public highway or estuary, obscured by buildings-included for mapping purposes.</td>
</tr>
<tr>
<td>CI 4* !</td>
<td>Bishopsteignton</td>
<td>Land at Clanage Cross</td>
<td>Outside settlement boundary, visible from PROW (Templer Way) &amp; estuary (Arch Brook Bridge, Coombe Cellars)</td>
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<tr>
<td>CI 5* !</td>
<td>Bishopsteignton</td>
<td>Land at Ashill Farm</td>
<td>Part of field outside settlement boundary, not visible from public highway, PROW or estuary, obscured by buildings-</td>
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<tr>
<td>CI 6</td>
<td>Bishopsteignton</td>
<td>Land at Greencroft</td>
<td>Small field/garden area outside settlement boundary, included for mapping purposes.</td>
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<td>CI 7*</td>
<td>Shaldon</td>
<td>Land rear of Nos 1-4 Torquay Rd</td>
<td>Part of field outside settlement boundary, glimpsed from estuary, glimpsed from public highway (Commons Old Rd) &amp; included for mapping purposes.</td>
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<tr>
<td>CI 8*</td>
<td>Shaldon</td>
<td>Ness Drive</td>
<td>Outside settlement boundary, visible from estuary &amp; sea, S.W.Coast Path at The Ness &amp; Teignmouth prom, except for small pockets, glimpsed from A379.</td>
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</tbody>
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**Inclusions**

* denotes Inclusion site in Local Plan First Review Initial Deposit Version 2001

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<td>CI 9*</td>
<td>Shaldon</td>
<td>St Nicholas Churchyard</td>
<td>Outside settlement boundary, visible from estuary &amp; public highway (A381 viewpoint), railway</td>
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<td>CI 10*</td>
<td>Shaldon</td>
<td>Land off Long Lane (part)</td>
<td>Outside settlement boundary, visible from estuary. Glimpsed only from public highway (A381, Long Lane)</td>
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<td>CI 11*</td>
<td>Shaldon</td>
<td>Land west of Ness House Hotel</td>
<td>Outside settlement boundary, visible from estuary &amp; sea, S.W.Coast Path at Ness, Teignmouth prom. Visible from</td>
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<td>Area No.</td>
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<td>CI 12 !</td>
<td>Shaldon</td>
<td>Part of field adjacent Long Lane</td>
<td>Part of field, included for mapping purposes.</td>
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<tr>
<td>CI 13</td>
<td>Shaldon</td>
<td>Small field adjacent Lambert’s Lane</td>
<td>Small field, included for mapping purposes.</td>
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<td>CI 14</td>
<td>Teignmouth/Shaldon</td>
<td>Estuary foreshore, River Teign &amp; beach</td>
<td>Direct marine influences (Tidal estuary/mudflats), visible from sea &amp; estuary, PROWs including SW Coast Path/Templer Way, public highway (A379 bridge, Marine Pde, Teignmouth prom) &amp; railway. Outside settlement boundaries.</td>
</tr>
<tr>
<td>CI 15</td>
<td>Stokeinteignhead</td>
<td>Land south of Stokeinteignhead at Rocombe &amp; Gabwell</td>
<td>Ridges &amp; upper valley slopes visible from estuary/sea but deep valley sections not visible. Visible from PROWs including Ridge Rd &amp; Butterfly Lane, public highways (A379, Ridge Rd, Stoke Rd, Rocombe Rd), numerous glimpses, not necessarily significant lengths.</td>
</tr>
<tr>
<td>CI 16</td>
<td>Stokeinteignhead</td>
<td>Land north of Stokeinteignhead</td>
<td>Low lying valley bottom washed over within broader undeveloped coast area, glimpsed from Stoke Rd.</td>
</tr>
<tr>
<td>CI 17*</td>
<td>Dawlish</td>
<td>Holcombe Road A379/Windward Lane</td>
<td>Outside settlement boundary, not visible from sea, glimpsed from SW Coast Path &amp; public highway (A379/Windward Lane)</td>
</tr>
</tbody>
</table>

**Inclusions**

*denotes Inclusion site in Local Plan First Review Initial Deposit Version 2001

! denotes Inclusion in LDF Core Strategy 2006

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<table>
<thead>
<tr>
<th>CI 18*! (part)</th>
<th>Dawlish</th>
<th>Land between Langdon Rd &amp; Long Lane</th>
<th>Visible from sea/estuary, parts visible from SWCP at Holcombe, glimpsed from public highway (A379 at Dawlish Warren). Lower fields adjacent Gatehouse Farm not visible, included for mapping purposes.</th>
</tr>
</thead>
<tbody>
<tr>
<td>CI 19</td>
<td>Dawlish</td>
<td>Land at Greenway Lane</td>
<td>Visible from estuary/sea</td>
</tr>
<tr>
<td>CI 20</td>
<td>Dawlish</td>
<td>Beach &amp; foreshore</td>
<td>Direct marine influences (beach/rocky foreshore), visible from sea, PROW (S.W. Coast Path) &amp; railway.</td>
</tr>
<tr>
<td>CI 22! (part)</td>
<td>Dawlish/Starcross/Kenton/Powderham/Exminster</td>
<td>Beach at Dawlish Warren, estuary foreshore, mudflats</td>
<td>Direct marine influences (beach, tidal estuary/mudflats), visible from sea/estuary, SW Coast Path/Exe Valley Way &amp; railway.</td>
</tr>
<tr>
<td>CI 23</td>
<td>Dawlish</td>
<td>Land at Dawlish Warren</td>
<td>Visible from sea, beach, PROW, direct coastal influence (former sand dunes &amp; coastal flood zone), partly developed, washed over as part of wider area.</td>
</tr>
<tr>
<td>CI 24</td>
<td>Dawlish</td>
<td>Land at Cockwood</td>
<td>Visible from Exe Estuary &amp; significant length of A379.</td>
</tr>
<tr>
<td>CI 25</td>
<td>Dawlish/Starcross</td>
<td>Cockwood Marsh/ Harbour, Starcross golf course &amp; land at Old Staplake Farm</td>
<td>Direct marine/coastal influences- Cockwood marsh/golf course/Old Staplake Farm (harbour/tidal/estuary/coastal flood zone) &amp; visible from S.W. Coast Path &amp; from public highway (A379, minor road ) &amp; railway.</td>
</tr>
<tr>
<td>CI 26</td>
<td>Starcross</td>
<td>Land north of Starcross</td>
<td>Direct marine influences (coastal flood zone) &amp; visible from estuary &amp; PROW (Exe Valley Way) &amp; public highway (A379).</td>
</tr>
</tbody>
</table>
### Inclusions

*denotes Inclusion site in Local Plan First Review Initial Deposit Version 2001

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<table>
<thead>
<tr>
<th>Area No.</th>
<th>Parish</th>
<th>Area Description</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>CI 27</td>
<td>Starcross</td>
<td>Land south west of Cofford Cottages</td>
<td>Direct marine influences- in coastal flood zone, glimpsed from A379 &amp; minor road/SWCP at Cockwood/Cofford Cotts.</td>
</tr>
<tr>
<td>CI 28</td>
<td>Kenton</td>
<td>Land at Penhayes, Kenton</td>
<td>Small area of field/garden included for mapping purposes.</td>
</tr>
<tr>
<td>CI 29</td>
<td>Kenton</td>
<td>Land at South Town, Kenton</td>
<td>Visible from Exe Estuary, Exe Valley Way &amp; A379.</td>
</tr>
<tr>
<td>CI 30</td>
<td>Kenton</td>
<td>Land adjacent River Kenn, Kenton</td>
<td>Direct marine influences- in coastal flood zone.</td>
</tr>
<tr>
<td>CI 31</td>
<td>Exminster</td>
<td>Land west of railway line including rising land up to Kenn Lane/Powderham New</td>
<td>Direct marine influences (coastal flood zone) &amp; visible from estuary &amp; public highway (A379, M5) &amp; PROWs including Exe Valley Way, visible from railway.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Plantation &amp; north of M5 bridge to Countess Wear Bridge</td>
<td></td>
</tr>
</tbody>
</table>
**Exclusions**

+ denotes Exclusion site in Local Plan First Review Initial Deposit Version 2001

# denotes Exclusion in LDF Core Strategy 2006

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<tr>
<th>Area No.</th>
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<th>Area Description</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>CE 1+</td>
<td>Bishopsteignton</td>
<td>Lawn’s End</td>
<td>Developed, within settlement boundary.</td>
</tr>
<tr>
<td>#</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CE 2+</td>
<td>Bishopsteignton</td>
<td>Lower Radway Farm</td>
<td>Part developed/garden within settlement boundary.</td>
</tr>
<tr>
<td>#</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CE 3+ / Bishopsteignton</td>
<td>Land adjacent to Radway Gardens</td>
<td>Part garden within settlement boundary.</td>
<td></td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------------------------------</td>
<td>----------------------------------------</td>
<td></td>
</tr>
<tr>
<td>CE 4 / Bishopsteignton</td>
<td>Land to rear of Teignview Rd</td>
<td>Small fields/gardens obscured behind buildings, should be within settlement boundary.</td>
<td></td>
</tr>
<tr>
<td>CE 5+ / Teignmouth</td>
<td>Land at New Road</td>
<td>Lower fields not visible, obscured by development</td>
<td></td>
</tr>
<tr>
<td>CE 6 # / Teignmouth</td>
<td>Broadmeadow playing fields</td>
<td>Not visible from estuary, obscured by development, glimpsed from SW Coast Path at the Ness, adjacent PROW &amp; public highways (Commons Lane)</td>
<td></td>
</tr>
<tr>
<td>CE 7+ / Teignmouth</td>
<td>Land at Higher Exeter Road</td>
<td>Developed, should be within settlement boundary.</td>
<td></td>
</tr>
<tr>
<td>CE 8 + / Dawlish</td>
<td>Lady’s Mile Holiday Camp</td>
<td>Part developed with permanent static caravans/mobile homes, within Holiday Development Area, not visible from sea/estuary-behind landform &amp; buildings.</td>
<td></td>
</tr>
<tr>
<td>CE 9 # / Dawlish</td>
<td>Lady’s Mile Holiday Camp</td>
<td>Not visible from sea/estuary-behind landform &amp; buildings, should be within Holiday Development Area</td>
<td></td>
</tr>
<tr>
<td>CE 10 / Starcross</td>
<td>NW edge of Starcross</td>
<td>Developed, should be within settlement boundary</td>
<td></td>
</tr>
<tr>
<td>CE 11 # / Starcross</td>
<td>Land west of Starcross</td>
<td>Not visible from estuary, obscured by development</td>
<td></td>
</tr>
</tbody>
</table>