

## **Proposed Response to Planning for Development and Coastal Change Consultation Document**

The council agrees to a strategic risk-based approach to managing future physical changes to the coastline as set out in the consultation document which allows for necessary development that is appropriate and safe.

The council agrees that it is appropriate that the wider consideration of ensuring coastal communities remain sustainable should be a matter for the local planning authority to deal with through their LDFs (as this is not the purpose of Shoreline Management Plans). However it is felt that this should be more clearly set out in the practice guide to support draft policy DCC3.1. Further the level of additional information or evidence gathering that will need to be undertaken to support local planning authorities with this wider consideration has to be appropriate to ensure a sound LDF document and further guidance in Section 37 of the proposed Practice Guide would be welcomed.

It is recommended that the consideration of 'sustainability criteria' or constraints to managing the coastal change should better reflect that many coastal areas are established developed areas with limited capacity to absorb relocated communities/ infrastructure. Furthermore coastal towns often already have to tackle issues of economic and social deprivation relative to the rest of their region and/or the need to improve coastal transport links to reduce their peripherality. This needs to be better reflected in the policy/ practice guide where the considerations of ensuring the continued economic and social viability of coastal communities in areas of coastal change are discussed.

It is recommended that the constraints that need be considered with options for managing change or adaptation such as identifying land outside coastal change management areas for relocating assets should include national designations such as National Parks and historic designations such as Conservation Areas.

The critical guidance required in the proposed Practice Guide is considered to be how to define the coastal change management area and set out the policy approach for properly managing existing assets. Particularly in the instance when it is only in the longer-time frame that those assets are at risk to ensure that there is some certainty and flexibility for those who own assets that are currently protected. Further, it is understood that Defra are soon to publish coastal erosion risk maps. It is not clear from the guidance how these should be used alongside SMPs in defining coastal change management areas and how these should be shown on Local Plan proposals maps. Further guidance is requested on this issue. There appears to be an inconsistency between the draft policy and the practice guide as to whether when defining the extent of coastal change management areas these should include areas allocated for relocated uses or whether land allocation will be outside the defined area.

Whilst it is welcomed that appropriate forms of new development will be allowed in coastal change management areas, in practise the options may be limited. There will be wider planning considerations to consider when identifying suitable alternative time-limited uses. It will not always be appropriate to suggest hotels, shops, offices or leisure activities in small-scale coastal

communities where the need for such use is limited and could undermine strategies for existing commercial areas.

It is requested that guidance should be provided on how to update these coastal change management areas as more understanding of rates of erosion and the impact of climate change are known. How to adequately plan for those areas currently on the 'right' side of the line, to raise awareness of the longer term potential risks to those areas and to avoid piecemeal long term planning of the wider coastal community.

The intention to provide guidance on how to manage the impacts of coastal change in the interim before LDDs can be updated to properly reflect the new policy is welcomed. In particular an indication of whether this is best addressed through the Core Strategy or can be addressed through Area Action Plans would be useful.