

DRAFT Chief Planning Officer's Advice Note: Planning for Coastal Change

This is one of a series of notes issued by the Chief Planning Officer to guide greater consistency when making planning decisions. These notes may be updated from time-to-time in response to changing circumstances.

It provides guidance to help reach a decision only and should not be used as a reason for refusal. The note cannot be used as a substitute for the policies of the adopted Local Plan.

Cornwall is distinctive with a coastline of around 700km long. Many of the existing settlements in Cornwall are coastal communities, some of which will be the focus for growth. It is important that coastal erosion and coastal change issues are taken into account in determining the appropriateness of such development.

Evolution of the shoreline represents a threat to some coastal communities. Rates of erosion and incidents of flooding are expected to increase throughout this century because of the increasing frequency and magnitude of storms and rising sea levels as a result of global warming. Coastal change is different to flooding- flooding occurs periodically, whereas coastal change will lead to permanent changes to the position and form of Cornwall's coastline.

The planning process seeks to ensure that development in areas subject to coastal change will be sustainable and safe. It must also ensure that development does not increase third party risks by impacting on the coastal processes.

Introduction

This document sets out Cornwall Council's position regarding development proposals close to the shoreline. It defines the proximity to the coast where a development needs to take account of potential coastal erosion and coastal change issues. It provides guidance on Coastal Vulnerability Assessments that may be required to accompany planning applications.

Statutory Context

Cornwall Council is the Coastal Protection Authority (CPA) and has the responsibility for consenting under the term of the Coastal Protection Act 1949. Building coastal protection or sea defenses that modify the natural processes will require CPA approval.

Policy Context

This Chief Planning Officer's Advice Note builds upon National Planning Policy and Guidance, Policy 26 of the Cornwall Local Plan and the Shoreline Management Plan 2011 (SMP2).

The **Cornwall Local Plan Policy 26** sets out the relevant policy in relation to Flood Risk Management and Coastal Change. The policy states that: -

- Development should take account of and be consistent with any adopted strategic and local flood and coastal management strategies including

the **Shoreline Management Plan** and Catchment Flood Management Plans for Cornwall and the SW River Basin Management Plan.

- Developments where applicable should support community-led local solutions to the management of coastal change.

The **National Planning Policy Framework (2018) (NPPF)** paragraphs 166 to 169 deal with coastal change.

The principle set out in the NPPF is to 'reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.'

Guidance on the interpretation of the NPPF policy on Coastal Change is provided within the Government's Planning Practice Guidance¹.

The NPPF requires plans to identify Coastal Change Management Areas (CCMAs) likely to be affected by physical changes to the coast. It states that policies for CCMAs should make clear what is appropriate within these areas and make provision for development and infrastructure that need to be relocated away from CCMAs.

CCMAs should only be defined where rates of shoreline change are significant over the next 100 years, taking account of climate change.

No CCMAs are currently adopted in the Cornwall Local Plan as it was considered that these would be more appropriately assessed through the Neighbourhood Development Plan process.

The Cornwall Shoreline Management Plan 2011 (SMP2)

The SMP1 was published in 1999 but has now been superseded by SMP2. A review of SMP2 for Cornwall and the Isles of Scilly was produced in 2016.

The SMP2 is a non-statutory policy document for coastal defence planning and sets out the desired approach to managing the shoreline over the next 100 years. This is done by considering location, time and policy. The SMP policy was overseen by Elected Members representing communities and all communities had the opportunity to input into the plan. Policy 26 of The Cornwall Local Plan states that development should take account of and be consistent with the SMP.

¹ <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/coastal-change-management-areas/>

The SMP area is divided into 259 individual policy units, each with a preferred policy option for each of the three time periods or ‘epochs’ up to the year 2105. There are four management policies that can be considered by the SMP as set out below.

SMP Policy approach.

- No active intervention (NAI)
- Hold the Line (HTL)
- Managed Realignment (MR)
- Advance the line (ATL):

Time or ‘epoch’

- Present day (2005-2025);
- Medium-term (2025-2055) and
- Long-term (2055-2105)

The South Devon and Dorset Shoreline Management Plan

A section of the Cornish coastline east of Rame Head – e.g. Kingsand, Cawsand, Torpoint, Saltash is covered by the [South Devon and Dorset SMP](#) because it sits in a coastal sediment cell along with the Tamar Estuary. Any development along this section of coastline will need to have regard to this SMP.

Neighbourhood Development Plans

The Council is encouraging Neighbourhood Plan Groups and Local Councils to adopt Coastal Change Management Areas through Neighbourhood Development Plans. A Neighbourhood plan Toolkit for Coastal Change Policy is being produced. This will provide a map of neighbourhood plan areas which are considered by the Shoreline Management Plan to be particularly vulnerable to coastal change and example policies to address the issues.

Extent of Jurisdiction

In general, local authority jurisdiction coincides with the authority’s administrative boundary. It is clear, and has been consistently agreed in the past, that coastal local authorities have administrative control and jurisdiction over areas down to low water mark. This can change around estuaries and harbours and where proposals extend into the sea it is worth confirming at an early stage where you need to go to seek the relevant permissions. Contacts are provided at the back of the document.

The Cornwall Coastal Vulnerability Map (CCVM) for Planning

Predicting rates of future coastal erosion is particularly difficult. Erosion is rarely slow and constant but occurs episodically. Despite the uncertainty in predicting future erosion rates it is

necessary to define a potential coastal erosion zone to identify planning proposals that might be vulnerable to coastal erosion.

The [Cornwall Coastal Vulnerability Map \(CCVM\)](#) covers the whole Cornish coast and can be viewed on the Council’s online [Strategic Flood Risk interactive map](#) (see layer ‘Coastal erosion - NCERM_NAI_LT_05_10m’).

The CCVM is a constraint area where land and development may be susceptible to coastal change over the next 100 years.

The area is based upon the National Coastal Erosion Risk Mapping (NCERM) prediction assuming that the SMP policies are followed, with a 5% probability of it being an underestimate over the long term. To seaward, the line extends to Mean Low Water Springs (MLWS).

The CCVM area is based on the best available evidence currently available. The CCVM will be reviewed to reflect improved evidence when available including the ‘Cliff and Shore Erosion under Accelerated Sea Level Rise’ project (SC120017).

Coastal Vulnerability Assessment (CVA)

The [Planning Practice Guidance](#) provides the following advice on what a Coastal Change Vulnerability Assessment would need to demonstrate:

“In considering the requirements in paragraph 168 of the National Planning Policy Framework a vulnerability assessment might demonstrate that the development:

- would not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate;
- will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences;
- would not affect the natural balance and stability of the coastline or exacerbate the rate of shoreline change to the extent that changes to the coastline are increased nearby or elsewhere.

The assessment could also consider measures for managing the development at the end of its planned life, including any proposals for the removal of the development before the site is immediately threatened by shoreline changes.”

Compatible Development

The following are considered compatible development subject to a Coastal Vulnerability Assessment

- Sea pools
- Beach huts
- Surf Lifesaving facilities

- Coastguard facilities
- Boating or fishing facilities
- Cafes
- Public toilets
- Car parking
- Temporary or moveable properties such as touring caravans, tents and motor homes used for holiday purposes.
- Extensions or alterations to an existing use/building which do not fundamentally change the scale and character of the use/building involved.
- Sea defences or Coastal Protection.

Permissions may be temporary or time-limited to accommodate future coastal change.

Where there is evidence that development may impact coastal processes, applications may still need to demonstrate that the proposal does not have an unacceptable impact on coastal processes and increase third party risk.

Exempt Development

Exemptions to development requiring a Coastal Vulnerability Assessment include:

- Minor development such as walls, fences, gates, elevation alterations, private gardens or bus shelters.
- Applications for advertisement control.
- Applications for works to trees

Private Sea Defences

We are not encouraging private sea defences. However, consent may be granted if an application can demonstrate that it would conform with the Coastal Protection Act and the intent of the Shoreline Management Plan.

Private sea defences and coastal protection structures require consent under the Coastal Protection Act 1949. This is independent to planning permission and considers the impact on coastal processes.

Replacement Dwellings

The Cornwall Local Plan supports the re-use of previously developed land (Policy 3 and 21) which includes the existing dwelling stock. It also supports replacement dwellings in the countryside (policy 7).

Subject to a satisfactory Coastal Vulnerability Assessment, showing that the existing building is protected for 100 years, as required by NPPF, the Local Planning Authority is sympathetic to the provision of a replacement dwelling that would be protected for the same period of time.

Change of use from Temporary Holiday Accommodation to Permanent Residential.

Paragraph 073 of the Planning Practice Guidance draws a clear distinction between sites used for holiday, caravans, camping and hotels and permanent new residential development. Where a development proposes the change of use from holiday accommodation to permanent residential, a Coastal Vulnerability Assessment will be required to demonstrate that the development will be acceptable.

Hold the Line coastal frontages

Where development is dependent on sustaining wider coastal defences in the long term to maintain a Hold the Line policy it is reasonable that such developments contribute to funding these defences in some way.

Coastal Access

Cornwall Local Plan states in paragraph 2.156 “Where possible the undeveloped coast should remain open unless development requires a coastal location such as flood defences and measures to improve public access and enjoyment.”

The Marine and Coastal Access Act 2009 also provides a requirement that development does not hinder the creation and maintenance of a continuous signed and managed route around the coast.

Dune Systems

Dunes are dynamic systems, subject to constant change and are particularly vulnerable. Permanent and fixed structures in these areas should be avoided, unless it can be demonstrated that the impacts would not impair the natural environment to adapt sustainably to the impacts of a changing climate.

Surface Water Drainage

In accordance with Policy 26 of the Cornwall Local Plan, appropriate provision should be made for the discharge of surface water drainage to ensure that it does not adversely affect coastal stability.

- Soakaways and other infiltration based sustainable systems are not recommended within 5 metres of the CCVMP zone as they may adversely affect coastal stability.
- Discharge of surface water directly over or down the face of a cliff is generally not appropriate.
- However, if no other method can be achieved, it should be demonstrated through a Coastal Vulnerability Assessment that the proposed drainage method would not adversely affect coastal stability.

Glossary

Coastal Change

Erosion along the coastline is a natural process. As one part of the coast is eroding, another may be accreting. Material derived from eroding cliffs may form a significant part of the beach sands below it or further along the coast.

Cliffs, beaches and sand dunes form natural sea defences. However, they are dynamic systems that move over time. This movement may be slow and barely noticeable, sudden and catastrophic (landslides) or influenced by manmade structures such as breakwaters and sea defence walls.

Tidal shorelines around estuaries are also important.

Coastal Squeeze

Coastal squeeze is where manmade structures have been built to protect communities from coastal flood and erosion risks, such as sea walls or rock revetments, the habitat may be prevented from moving landward as sea level rises, and it is squeezed up against these defences. This means that the extent and functioning of the coastal habitat reduces over time, along with the habitats and species that it supports. In places, we cannot prevent this as we are required to protect large communities from coastal flooding and erosion. However, coastal adaptation can provide mitigation for coastal squeeze.

Coastal Adaptation

Coastal adaptation focuses on managing change to minimise negative consequences but also has the potential to provide new opportunities. Managing the impacts of climate change, such as reducing risks from more frequent flooding and erosion can be defined as adaptation; where we are adapting to a changing environment.

Many of the suggested adaptation options for those who own or manage assets at risk need to be seen as part of a package of potential ways forward, rather than individual solutions. There is unlikely to be one solution that is satisfactory to all or suitable in all locations. A flexible approach is required so different needs can be recognised and taken into consideration.

Sea Level Rise and Climate Change

Increased frequency and magnitude of storms due to climate change and rising sea levels as a result of global warming are likely to increase coastal erosion and coastal change in the near and distant future.

Best estimates of sea level rise for use in Planning over the next 100 years are in excess of 1 metre based on the UKCP09 scenarios. In addition to this, increased

storm surges are likely to add a further 0.7 metres during storm events by the end of the Century and extreme wave heights and offshore wind speeds are both expected to increase by 10%². Updated predictions of sea level rise and climate change are expected to be issued before the end of 2018 (UKCP18).

Coastal Change Management Areas

These are recognised through the Shoreline Management Plan. The purpose of Coastal Change Management Areas (CCMAs) is to highlight issues of coastal change and to allow them to be planned for.

Sea Defenses

Sea defenses refers to any structure that aims to reduce flooding from the sea

Sea Protection

This refers to any structure that aims to prevent or reduce coastal erosion.

Contacts

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² Adapting to Climate Change: Advice for Flood and Coastal Erosion Risk Management Authorities. Environment Agency 2011 (updated 2016).