

# Planning for coastal resilience

Avoiding coastal 'lock in'

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Photograph: Dan Kitwood/Getty (Newhaven in Storm Eunice, Feb 2022)



**RTPI South East**  
Royal Town Planning Institute



**University of Brighton**

# Content

- what the NPPF says
- summary of some of the research about coastal change and planning (including ongoing research)
- what the NPPF Prospectus says (published just before Christmas) & some of the main changes to Planning Practice Guidance
- my ideas about coastal change / flooding and other important coastal issues.



# The National Planning Policy Framework (2021)

## NPPF paras 170-173

- Take account of Marine Policy Statement
- Implement Integrated Coastal Zone Management
- Define Coastal Change Management Areas in any area likely to be affected by physical changes to the coast, (based on Shoreline Management Plans)
- Avoid or limit lifetime of developments in CCMA...



Photo: Finn Hopson / Brighton Photography Gallery



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**Don't Forget - NPPF footnote 7**  
Non-compliance with coastal change policies *disapplies* presumption in favour of sustainable development

Photo: Finn Hopson / Brighton Photography Gallery



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# Coastal Change Management Areas - NPPF

- Local plans should set out what development is appropriate and in what circumstances
- Make provision for development that needs to be moved away from CCMAAs
- Development is only appropriate if:
  - Safe over its lifetime
  - Does not have unacceptable impact on coastal change
  - Character of coast is not compromised (inc designations)
  - Provides wider sustainability benefits
  - Does not hinder English Coastal Path
  - Temporary permissions to limit lifetime of development



# Defining CCMA – some questions arising from Planning Practice Guidance

This is an area identified in plans as likely to be affected by physical changes to the coast. Such changes include erosion, coastal landslip, permanent inundation or accretion. A Coastal Change Management Area will only need to be defined where rates of shoreline change are expected to be significant over the next 100 years, taking account of climate change.

Not just sea level rise?

Defined how?

From when?

They will not normally need to be defined where the accepted shoreline management plan policy is to hold or advance the line (maintain existing, or build new flood and coastal erosion risk management infrastructure) for the whole period covered by the shoreline management plan, subject to evidence of how this may be secured, taking advice from the Environment Agency.

DLUHC, (2022) Paragraphs: 071 & 072)

How realistic?



Beyond Local Plan lifetime

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# Some research findings about coastal change and planning



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# Committee on Climate Change (2018) 'Managing the coast in a changing climate'

Climate change will exacerbate the already significant exposure of the English coast to flooding and erosion. The current approach to coastal management in England is unsustainable in the face of climate change

- Coastal communities, infrastructure and landscapes already face threats from flooding and coastal erosion. These threats will increase in the future.
- In the future, some coastal communities and infrastructure are likely to be unviable in their current form. This problem is not being confronted with the required urgency or openness
- Sustainable coastal adaptation is possible and could deliver multiple benefits. However, it requires a long term commitment and proactive steps to inform and facilitate change in social attitudes



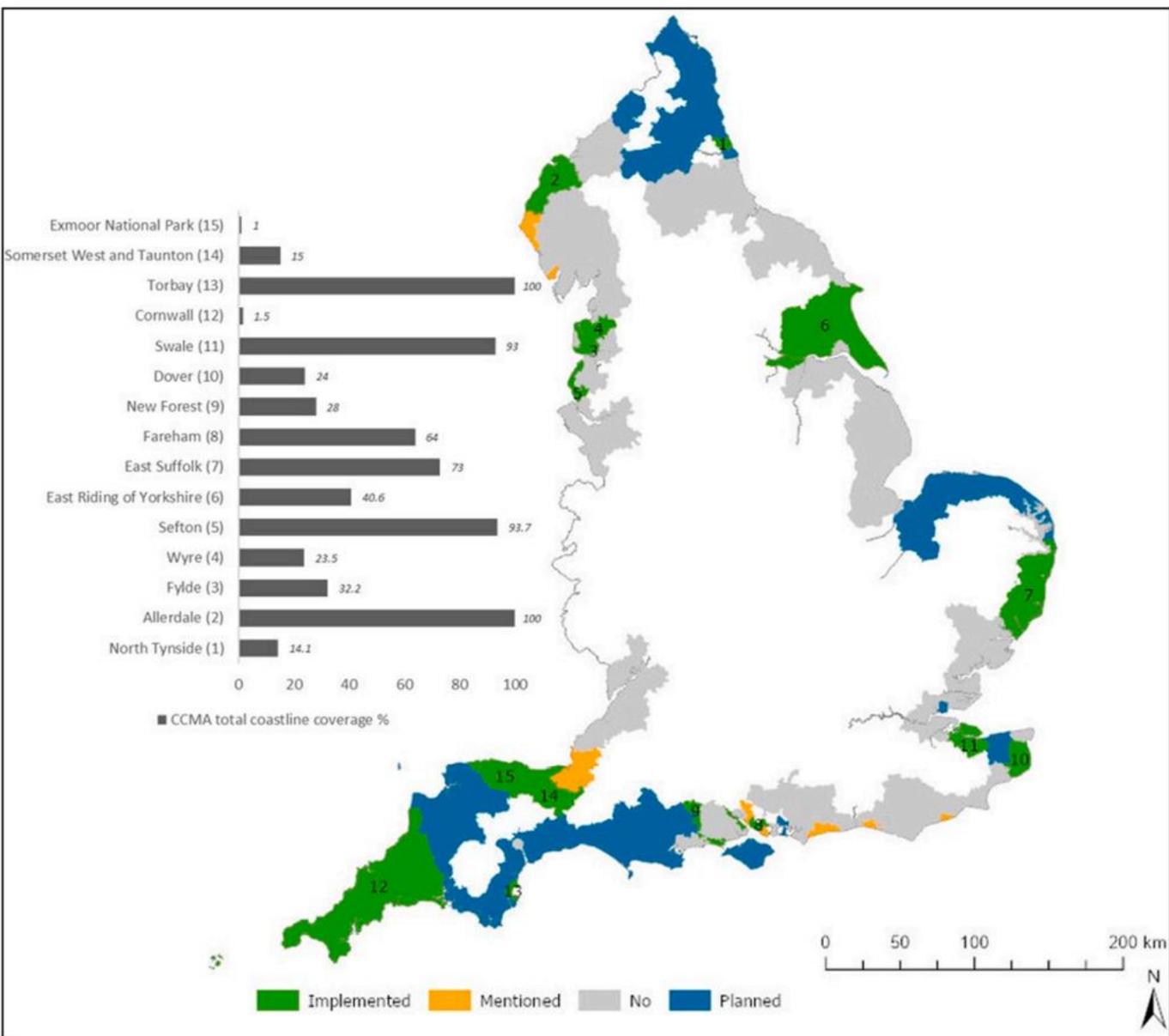
# Kirby et al (2021): Coastal adaptation to climate change through zonation

Plymouth University researchers studied the approaches of all 100 English coastal local planning authorities (cLPAs) in their existing and draft local plans and found that:

- 'inadequate and ambiguous' guidance has reduced the effectiveness of the national policy with coastal planning authorities unsure which datasets to use for delineating CCMA
- the datasets that are available vary in erosion predictions and do not account for expected sea-level rise
- only 15% of coastal planning authorities have designated a CCMA, with just 5.7% of the coast of England designated as a CCMA (esp in SE England), and vulnerable coastal areas are omitted from CCMA.



Status of CCMA in  
cLPA plans (source:  
Kirby et al (2021; Fig  
4))

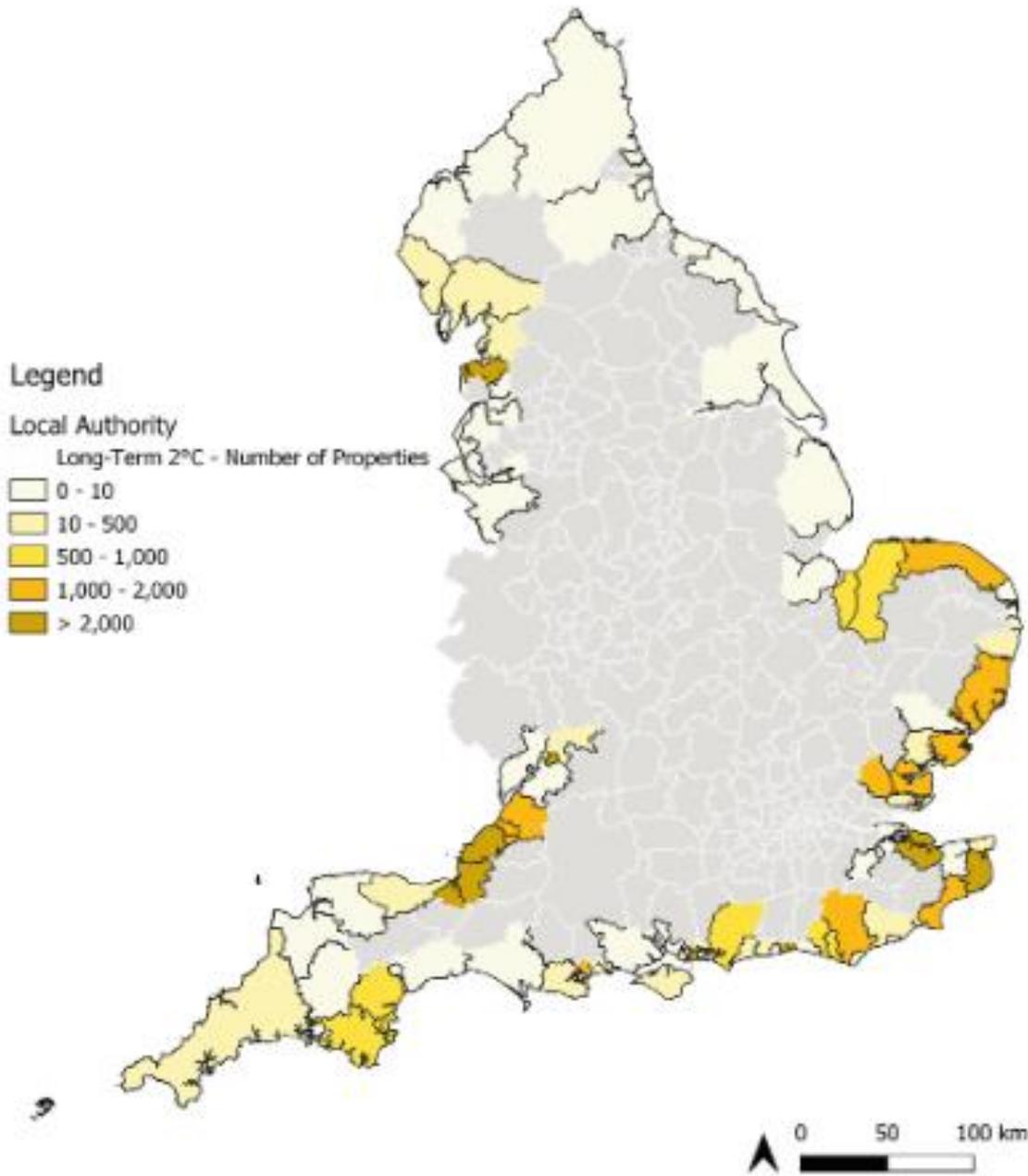


# Sayers et al (2022): Responding to climate change around England's coast

Explored the scale of the transformational challenge in England up to 2100. The combined influences of relative Sea Level Rise, the realism of published shoreline policies based on projected changes in flood risk and benefit-cost considerations were assessed:

- With continued current levels of adaptation, suggests a significant acceleration in the scale of coastal flood risk towards the end of the century
- 1,600–1,900 km (~30%) of England's shoreline is likely to experience increased pressure to realign by 2050s with implications for ~120,000–160,000 properties
- The decision to relocate a community will always be difficult and involve multiple complex trade-offs. Revised SMPs and strategic planning can provide the vehicles to do this.





Number of properties that could come under increasing pressure to transition from a Hold-the-Line to a realignment /relocation in the long term (50–100 years ahead)  
(Source: Sayers et al. (2022, Figure 14))



# Wyre Council (unpublished): A review of the designation and application of coastal change management areas

Part of the SMP Planning Interface Project funded by the Environment Agency, supported by the Marine Management Organisation and other NW Councils. Findings included:

- uncertainties over SMPs including if up-to-date, climate change, funding, level of detail
- very limited use of CCMA by NW cLPAs (5/20) and assumptions/evidence/reasons used to define them varied e.g. landscape character, habitat creation
- policy approaches in NW CCMA vary – 1 had a relocation policy, 2 required vulnerability assessments, 0 limited lifetime, different approaches to defining acceptable development in a CCMA
- Some good examples of CCMA approaches in England, but greater clarity needed on defining and implementing them. NW guidance being produced.



# University of Brighton MSc Town Planning student dissertations

- Very little weight being given to SMPs in Local Plans (Tucker M, 2018)
- Wide variation between coastal LPAs in planning for housing in tidal flood zones – including not taking 100 year lifetime into account (Kennedy S, 2019)
- Development pressures directing more housing to coastal flood zones and new climate change predictions undermining future resilience of recently constructed housing (Motley A, 2021)



## What the NPPF Prospectus says (published just before Christmas)

15. ...We will keep this important aspect of national policy under review to ensure it is sufficiently robust to keep future development safe from floods and to not increase risk elsewhere. This includes reviewing the planning policy approach for areas at the coast in managing and adapting to coastal change and sea level rise.

16. To support practitioners to ensure that development meets the strict policy criteria in relation to flood risk, including the location of development, in August 2022 we published a significantly revised and updated flood risk and coastal change section of the Planning Practice Guidance.

(DLUHC, 2022, paras 15-16)

**i.e. Respond  
to the  
consultation  
by 3<sup>rd</sup> March!**



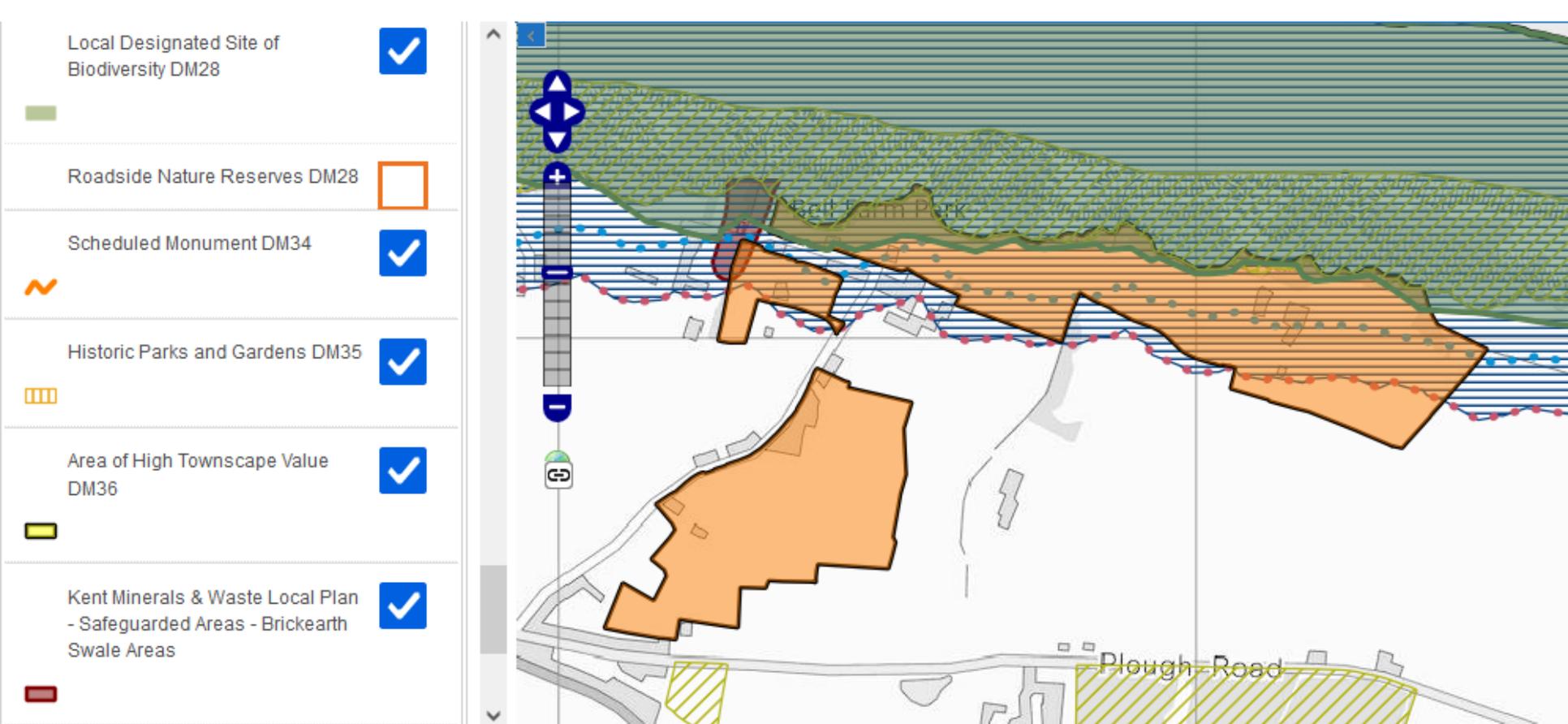
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# Main coastal changes to PPG (August 2022)

Useful EA Briefing Note & TCPA webinar (see References):

- Encourages more precautionary approach to designating Coastal Change Management Areas (CCMAs)
- Allows more flexibility for existing buildings/land-use to enable transition
- Clearer requirement for 'vulnerability assessment' when development proposed in CCMAs
- Need to consider Article 4 Directions to remove Permitted Development Rights in CCMAs





## Swale BC Local Plan

- Defines CCMA, including 2 erosion zones (ERs) and existing developments
- Identifies 'appropriate' development
- Requires vulnerability assessment
- Temporary permission, with legal agreement
- Allows relocation subject to criteria

BUT

- Allows resi subdivision in ER2
- Conflict with holiday parks continuing?

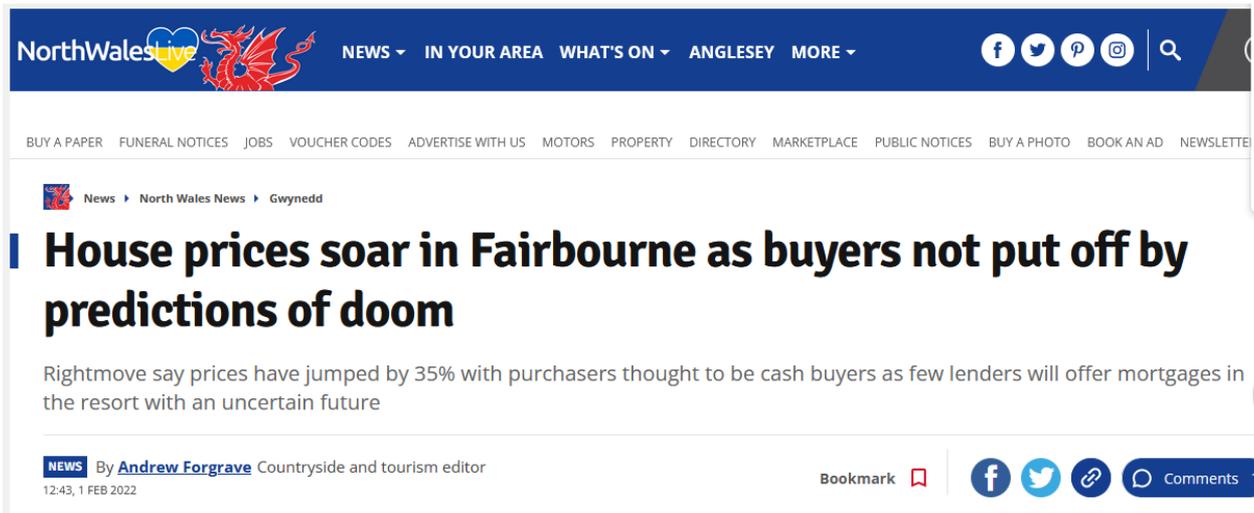
## An example of a CCMA

Source: Swale BC (2017)  
Proposals Map



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# Blight of relocation is a myth?



The screenshot shows the top navigation bar of the North Wales Live website. The logo features a red dragon and the text 'NorthWalesLive'. The navigation menu includes 'NEWS', 'IN YOUR AREA', 'WHAT'S ON', 'ANGLESEY', and 'MORE'. Social media icons for Facebook, Twitter, Pinterest, and Instagram are visible, along with a search icon. Below the navigation bar, there is a secondary menu with links for 'BUY A PAPER', 'FUNERAL NOTICES', 'JOBS', 'VOUCHER CODES', 'ADVERTISE WITH US', 'MOTORS', 'PROPERTY', 'DIRECTORY', 'MARKETPLACE', 'PUBLIC NOTICES', 'BUY A PHOTO', 'BOOK AN AD', and 'NEWSLETTER'. The main content area shows a breadcrumb trail: 'News > North Wales News > Gwynedd'. The article title is 'House prices soar in Fairbourne as buyers not put off by predictions of doom'. The sub-headline reads: 'Rightmove say prices have jumped by 35% with purchasers thought to be cash buyers as few lenders will offer mortgages in the resort with an uncertain future'. The author is 'By Andrew Forgrave, Countryside and tourism editor'. The article is dated '12:43, 1 FEB 2022'. At the bottom of the article, there are 'Bookmark' and 'Comments 1' buttons, along with social media sharing icons for Facebook, Twitter, and a link icon.

NorthWalesLive NEWS IN YOUR AREA WHAT'S ON ANGLESEY MORE

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News > North Wales News > Gwynedd

## House prices soar in Fairbourne as buyers not put off by predictions of doom

Rightmove say prices have jumped by 35% with purchasers thought to be cash buyers as few lenders will offer mortgages in the resort with an uncertain future

NEWS By [Andrew Forgrave](#) Countryside and tourism editor

12:43, 1 FEB 2022

Bookmark

Facebook Twitter Link Comments 1

## 'Monstrous' sea defence plans will devalue homes, residents fear

Homeowners living on the coast say their views will also be obscured by a nine-foot high earth bund

NEWS By [Richard Evans](#) Local Democracy Reporter

05:55, 27 JAN 2022 | UPDATED 13:29, 27 JAN 2022

Bookmark



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# Future coastal planning policy – my suggestions

- Make the connections with coastal managers and other services that will be needed for adaptation, relocation + identify funding
- SMPs should be more realistic – tested and statutory?
- **Designate CCMA**s – but use other sources of info to define them – remember ICZM
- Need stronger CCMA policy in NPPF and clearer guidance in PPG – more akin to flood risk approach
- Think long term
  - be precautionary in terms of climate change
  - think 100 years +
  - include land designations/relocation policies
  - remove p.d. rights



## Other coastal issues

- Levelling-Up – planning is underperforming in coastal towns – see Denning-Johnson and Coleman (2022)
- Regulation of short-term lets (DCMS, 2022)?
- Implications of water companies' Stormwater Action Plans / Drainage and Wastewater Infrastructure Plans – a lot of new development in the coastal zone (Defra, 2022)
- BNG and blue carbon opportunities (seagrass 35 times more effective at locking carbon than rainforest) (BBC, 2021)
- Links with marine planning, growth of awareness of the 'blue economy' and implementing ICZM – Motion for the Ocean (Ocean Conservation Trust, 2022)





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- MSc / PG Diploma / PG Cert Town Planning
- Only RTPI and RICS-accredited course on south coast
- Specialising in sustainable coastal planning, climate change and development viability
- Many options available
- Study full or part time
- Level 7 Chartered Degree Apprenticeship entry available
- 100% graduate employment success
- Graduates have won, been commended and shortlisted in RTPI Research Awards (Student) category

Contact: [G.Wrighton3@brighton.ac.uk](mailto:G.Wrighton3@brighton.ac.uk)

<https://www.brighton.ac.uk/courses/study/town-planning-msc-pgcert-pgdip.aspx>



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[https://www.theplanner.co.uk/authors/andrew-  
coleman](https://www.theplanner.co.uk/authors/andrew-coleman)



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- DLUHC (2021) 'Planning Practice Guidance: Flood Risk and Coastal Change' <https://www.gov.uk/guidance/flood-risk-and-coastal-change>
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