

Consideration of the need to designate Wirral Coastal Change Management Areas **Background Paper**

Documents reviewed:

Shoreline Management Plan 2 (2011),

Wirral Coastal Strategy and Appendices (2012)

Thurstaston Cliffs Behaviour Assessment Technical Note (Nov 2020) and latest Wirral Coast Shoreline Inspection report (2021)

Predicted erosion lines for 20, 50 and 100 years (GIS files)

National Coast Erosion Risk Map [National Coastal Erosion Risk Mapping \(arcgis.com\)](https://arcgis.com)

Guidance documents on CCMA's: [Coastal Change Management Areas \(CCMA's\) – Methodology and Adoption Reports - The South West Partnership for Environmental and Economic Prosperity \(sweep.ac.uk\)](#)

[Microsoft Word - Coastal Change Adaptation Planning Guidance FINAL August 2015.docx \(wordpress.com\)](#) (Halcrow) Produced for East Riding of Yorkshire Council.

National Planning Policy Framework (2021):

Planning Practice Guidance [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Background

The National Planning Policy Framework (NPPF) advises as follows with respect to coastal change:

171. Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:

(a) be clear as to what development will be appropriate in such areas and in what circumstances; and

(b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.

172. Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:

(a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;

(b) the character of the coast including designations is not compromised;

(c) the development provides wider sustainability benefits; and

(d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast.

173. Local planning authorities should limit the planned lifetime of development in a Coastal Change Management Area through temporary permission and restoration conditions, where

this is necessary to reduce a potentially unacceptable level of future risk to people and the development.

Approach to considering the need for CCMA(s) in Wirral

The PPG suggests a CCMA will only be defined where rates of shoreline change are significant over the next 100 years, taking account of climate change. They will not need to be defined where the accepted shoreline management plan (SMP) policy is to hold or advance the line (maintain existing defences or build new defences) for the whole period covered by the plan, subject to evidence of how this may be secured.

The Halcrow guidance elaborates on the circumstances when CCMA's should be considered - where:

- SMP policy is not to defend the coast (NAI)
- SMP policy is to implement managed realignment of a section of coast; or
- Shoreline change will be significant over next 100 years; for example, if this will have an important impact on existing development or planned future land use (economically, socially or environmentally).

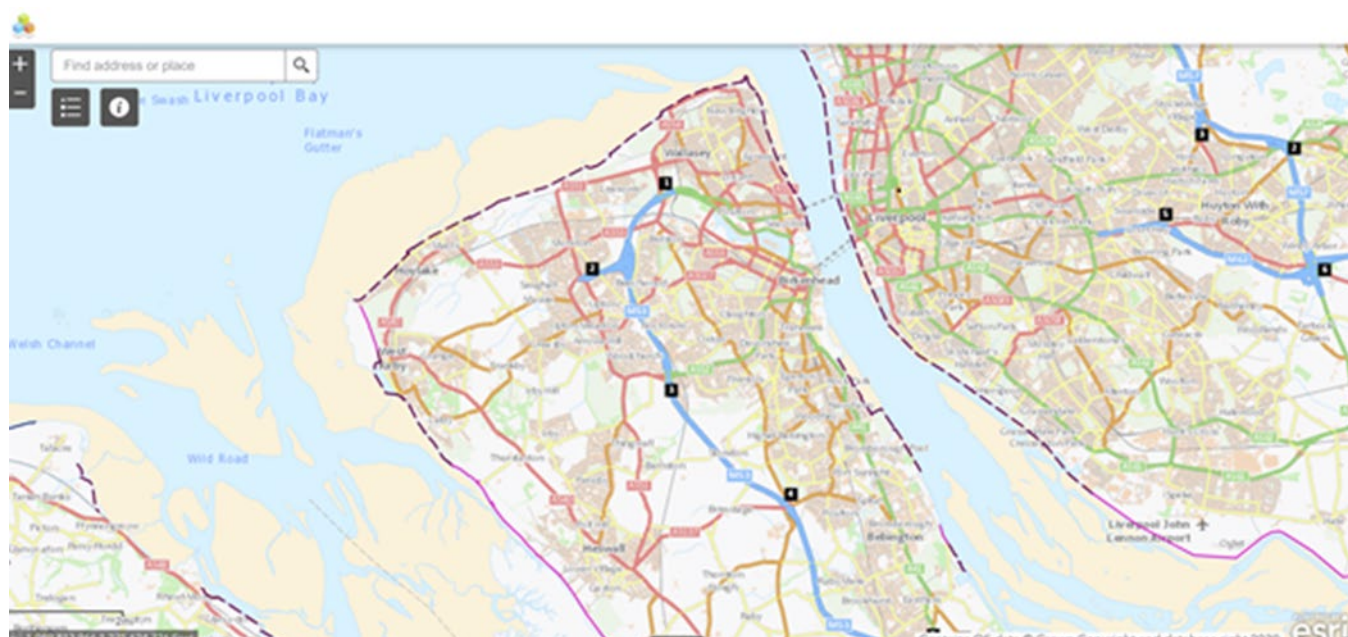
The following is based on the suggested methodology in the Halcrow report which sets out a process of up to four stages in determining the need for a CCMA.

Stage 1 – review SMP Policies

This stage involves appraising the risk from the Shoreline Management Plan (SMP) and interpreting its policies in order to establish potential CCMA's. The key questions in guiding potential CCMA's in Stage 1 of the process are:

1. Is the SMP policy not to defend the coast (NAI)? If yes, a CCMA may be a useful approach.

Several sections of the Wirral coast are subject to NAI policies in the Shoreline Management Plan. They are shown on the screenshot from the National Coast Erosion Risk Mapping (NCERM) below marked with a solid red line – Riverwood Road to Eastham Ferry, Red Rocks and the Dee Coast south of the Dee Sailing Club to the Borough boundary. In addition, two additional sections of coastline are considered below - the cliffs at Shorefields subject to a hold the line policy which was identified in the UDP as an area subject to coastal erosion and was included in the shoreline Inspection report in response to concerns of local residents following winter storms of 2013-2014 and the coast between Leasowe Bay and Harrison Groyne which identified possible managed realignment in the 3rd epoch of the Shoreline Management Plan.



Riverwood Road to Eastham Ferry: No Active Intervention

Physical Setting: Natural (undefended) coastline; hard cliffs; estuary

SMP policy of no active intervention for all epochs. Identifies limited expected impacts due to small changes on natural rocky shoreline.

Wirral Coastal Strategy: (strategy Unit 14 - includes defended Bromborough Frontage). The preferred option for this unit is Option 3, with works other than maintenance deferred until the medium term at the earliest and the scope of future capital works requiring more detailed assessment of the integrity of structures and Partnership funding arrangements to be implemented. In the discussion section it was noted that Option 1 (no active intervention across all 3 epochs) would result in erosion over all three timeframes in areas where there are currently no defences, including Eastham Country Park (Policy unit 7.2 of the SMP), whilst other sections of currently defended frontage, including Bromborough Docks and the sections either side of Eastham Locks could potentially be affected in the long term. In addition, shoreline assets would become increasingly at risk from overtopping. Within the northern half of this frontage up to nine properties would be lost by the long term from erosion and there would be some loss of Eastham Country Park and SBI. Whilst the assets at risk from erosion and flood risk are significantly less than other frontages, a policy of no active intervention would not provide any management for the adaptation of the frontage and whilst the ship canal and industry along the southern half would not be a risk from erosion within the strategy no active intervention could weaken these assets putting them at risk beyond the lifetime of the strategy.

0-20 years	20-50 years	50-100 years
Maintain existing public and private dock walls & linear defences	Maintain existing public and private dock walls & linear defences	Maintain existing public and private dock walls & linear defences

	Provide new works to existing dock walls as necessary (provisional). Provide secondary flood protection measures, as necessary	Provide new works to existing dock walls as necessary (provisional). Provide secondary flood protection measures, as necessary
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NCERM mapping suggests a maximum retreat distance of up to 6.60 metres for the various scenarios considered.

Not covered by the 2021 Shoreline Inspection Report

Landownership: Eastham Country Park; Wirral Council; foreshore Crown Estate

Existing Local Plan designation: UDP: a combination of urban greenspace and green belt, plus countryside recreation site (Eastham Country Park), undeveloped coastal zone and Site of Biological importance. There are a number of buildings connected with the running of the park, a boarding cattery (with a dwelling) and the Tap pub. Foreshore is SSSI/Special Protection Area.

Proposed Local Plan 2020-2037 designation – proposed to retain greenbelt/open space designation, at Eastham Country Park and Local wildlife site designation. Proposed housing allocations at Riverside Park and MoD are within this section, but the nearest boundary of the Riverside park site is approx. 300 metres from the shoreline. UDP Coastal Zone designation not retained in emerging Local plan as superseded in national planning policy by CCMA approach. Proposed Local Plan Policy WD4 will state that Development proposals within areas likely to be affected by coastal erosion will only be permitted where it can be demonstrated that erosion or landslip are not likely to occur during the lifetime of the development and it is therefore safe, in line with national policy. Foreshore to remain SSSI/Special Protection Area

Planning Applications: None within or adjacent to 100-year erosion line. Planning application submitted for residential development at Riverside Park

Infrastructure: Ferry Road (adopted highway), car park for Eastham Country Park. Wirral Circular Trail footpath/cycle route. No proposals in IDP within or adjacent to 100 year erosion line

Neighbouring Authority implications: Close to boundary with Cheshire West and Chester Council. Coastal Strategy envisages possible long-term impacts on assets within CWaC, specifically the Manchester Ship Canal under a NAI scenario.

Summary: Given limited predicted maximum retreat distance and the conclusions of the Wirral Coastal Strategy, which envisages the need for potential intervention to protect upstream assets of the Manchester Ship Canal in the long term, designation of a CCMA would not seem to be justified or necessary in this Local Plan. Proposed Local Plan Policy WD4 provides additional safeguards. However, the need for a CCMA should be considered again when the Local Plan is reviewed or replaced (likely to be within 5 years of adoption), in light of any additional evidence which becomes available in the interim.

Red Rocks: No Active Intervention

Setting: sand dunes, reedbed, marsh, 'green beach'

SMP: No active intervention for all epochs

NCERM mapping suggests a maximum retreat distance of up to 40 metres in the long term for the various scenarios considered. SMP 100-year erosion line is within boundary of nature reserve seaward of dune slacks.

Wirral Coastal Strategy: (Strategy Unit 5): preferred option for this unit is no active intervention and local beach management over all 3 epochs. It notes that no active intervention will result in a naturally functioning coastline and beneficial effects on the Dee Estuary protected sites. This option will afford protection to the assets which include the Royal Liverpool Golf Course, however there will be negative effects on Red Rocks SSSI and the local SBI. Whilst this option will result in negative effects these will be from natural processes through which the habitat will change and adapt to; as such this option is considered appropriate for this frontage.

2021 Shoreline Inspection Report: recorded no change in conditions applying across the Royal Liverpool Golf Club frontage apart from slight spread in green beach between dunes and Marine Lake due to lack of beach management in 2021. Current assent from Natural England for raking of the beach and removal of debris here, expired in March 2021. Renewal of this assent is currently being sought.

Landownership: Cheshire Wildlife Trust

Existing Local Plan Designation: UDP: Green Belt; Coastal zone; Site of Special Scientific Interest (SSSI); Site of Biological Importance (Royal Liverpool Golf Course) to rear, Dee Estuary is SSSI/Special Protection Area/Special Area of Conservation/Ramsar site, Area of Special Landscape Value. The boundary of the Hoylake Neighbourhood Area bisects the Royal Liverpool golf course, well inland from the 100 year erosion line

Proposed Local Plan 2020-2037 designation: Green Belt, Local Wildlife Site (Royal Liverpool Golf Course), foreshore retains SSSI/SPA/Ramsar designation. UDP Coastal Zone designation not retained in emerging Local plan as superseded in national planning policy by CCMA approach. Proposed Local Plan Policy WD4 will state that Development proposals within areas likely to be affected by coastal erosion will only be permitted where it can be demonstrated that erosion or landslip are not likely to occur during the lifetime of the development and it is therefore safe, in line with national policy.

Planning applications: None within or adjacent to 100-year erosion line.

Infrastructure: none

Neighbouring Authority Implications: none

Summary: Given the conclusions of the Wirral Coastal Strategy in relation to the impact of no active intervention on the Royal Liverpool Golf Club, albeit with some impact on designated nature conservation interests. The Green Belt status of the Royal Liverpool Golf Club significantly limits the scope for any permanent built development such as housing in this location during the lifetime of the Local Plan. Proposed Policy WD4 provides additional

safeguards. As such, designation of a CCMA would not seem to be necessary or justified in this Local Plan. However, the need for a CCMA should be considered again when the Local Plan is reviewed or replaced, in light of any additional evidence which becomes available in the interim.

Thurstaston Slipway (Dee Sailing Club) to Gayton (Borough Boundary): No Active Intervention

Physical Setting: mix of undefended clay cliffs, private defences, salt marsh, wastewater treatment works, small cluster of built development around Banks Rd, Park West, Seabank Rd, Riverbank Rd and Cottage Lane – residential, restaurant, agricultural land, golf course (Heswall Golf Club)

SMP: No active intervention for all epochs with caveats to allow for continued limited intervention to maintain existing defences where economically justified and environmentally acceptable. Reassess justification for intervention if erosion becomes re-established. Insufficient economic justification for new shoreline defences to whole unit, but maintaining localised short lengths of existing flood defences may be economically justified as long as there are no adverse affects on sediment movement, coastal processes, the SSSI.

Wirral Coastal Strategy:

Heswall to Gayton (strategy Unit 1)

The Options appraisal concluded that Option 3 was preferred, subject to funding of maintenance of existing defences by those bodies who are responsible in the short and medium term and Partnership funding of such improvement measures that may be required in the long term. Option 3 proposes the maintenance of existing linear defences where they exist, otherwise No Active Intervention for the 0-20- and 20-50-year epochs. For the long term 50-100 years, the same approach is proposed, plus allowing the shoreline to evolve naturally once defences are no longer viable to maintain; providing adaptive and resilience measures to protect individual residential properties, as necessary; and replacing life-expired linear defences to commercial/industrial property where necessary.

Due to the accretion of the Estuary along this unit the Coastal Strategy noted that predicted erosion rates are very minor along this frontage. As such the magnitude of the effects along this unit are much smaller than those in other units within the strategy under the no active intervention scenario. Option 3 provides a balance between the other three options by providing protection to individual assets, both residential and commercial, whilst allowing the majority of the shoreline through this unit to evolve naturally.

Thurstaston Cliffs (Strategy Unit 2)

Only one option was assessed in the Coastal Strategy, that of no active intervention across all 3 epochs. This was therefore the preferred option for this unit with private funding required for any actions associated with the cliff top holiday park or Shore Cottage (the only permanent material asset). In the longer-term, actions may, subject to more detailed appraisal, be required to address issues associated with exposure of the historic landfill. This would most appropriately be considered alongside arrangements associated with the present defences in front of the Dee Sailing club and future usage associated with the Thurstaston causeway.

NCERM mapping suggests a maximum retreat distance of up to 40 metres for the various scenarios considered for the section between Thurstaston slipway and Target Rd; between Target Road and the Borough boundary, mapping suggests a maximum retreat distance of up to 6.60m for the various scenarios considered.

Shoreline inspection report 2021: Concluded no noticeable change in conditions applying upstream of Thurstaston Cliffs; Significant slumping and erosion of cliffs occurred during winter 2020-21 along entire Thurstaston Cliffs frontage, apart from in vicinity of Shore Cottage. This primarily driven by surface water run-off; Little change in Gayton channel alignment opposite Tinker's Dell and further downstream across Thurstaston cliffs frontage.

Cliff Behaviour Assessment Technical Note (2020) : commissioned as an assessment of the erosion risk to the mobile and static caravan sites at the top of the cliffs to inform management of erosion and flooding issues at the site; address the Council's responsibilities in managing risks at the coast; inform current lease negotiations between the Council and Caravan and Motorhome Club (CMC) which operates the touring caravan site at the top of the cliffs; and identify any mitigation measures required to protect Council interests. Noting that the SMP and Wirral Coastal Strategy preclude any works to prevent erosion taking place at the toe of the cliffs, the focus would have to be on adaptation measures within the CMC site itself, including realignment of a land drain along the cliff top (combined with a wider appraisal of land drainage to remove the discharge of drainage waters onto the cliff face); short term re-alignment of boundary fences; in the medium term relocate or remove pitches at risk of erosion in the next 30 years and a medium-long term review of risk to the adjacent Thurstaston owners static caravan site the risks to which are presently low but will increase with time. It was considered essential that continued monitoring forms part of any on-going management strategy for the frontage.

Landownership: Wirral Council, private landowners, Dwr Cymru Welsh Water

Existing local plan designation: UDP: Green Belt; coastal zone; Dee Coast Area of Special landscape value (covers both Dee Estuary and inland); Dee Cliffs SSSI; Dee Estuary SSSI/Special Protection Area/Special Area of Conservation/Ramsar site, Area of Special Landscape Value. UDP includes a map in the written statement identifying the land liable to erosion suggesting a projected recession rate of 0.5m per year. The map is linked to Policy CO5 (Development requiring additional coastal defence works) and Policy CO6 (Development within areas at risk of coastal erosion).

Proposed Local Plan 2020-2037 designation: Green Belt, amended local landscape designation; nature conservation designations as above. UDP Coastal Zone designation not retained in emerging Local plan as superseded in national planning policy by CCMA approach. Proposed Local Plan Policy WD4 will state that development proposals within areas likely to be affected by coastal erosion will only be permitted where it can be demonstrated that erosion or landslip are not likely to occur during the lifetime of the development and it is therefore safe, in line with national policy.

Planning applications: aside from applications for replacement dwellings and householder applications for house extensions etc, no significant planning applications.

Infrastructure: Dee Sailing club, caravan park, Wirral Country Park Visitor Centre, residential

Neighbouring Authority Implications: border with Cheshire West and Chester Council – within same SMP policy unit (5.5). Cheshire West and Chester Council Local Plan (parts 1 & 2) do

not designate a coastal change management area. Green Belt continues into Cheshire West and Chester so same policy protections apply. No known major development proposals.

Summary: for the section between Dee Sailing club and the end of Target Rd Lower Heswall (Strategy Unit 2) proposing a CCMA would seem not be necessary or justifiable in this Local Plan. This is based on the forecast rate of change, that the Council is the freeholder of the land at the top of the cliffs, (which is also in the Green Belt so there is very low risk of inappropriate permanent development such as housing being proposed during the lifetime of this Local Plan), the risks and mitigation relating to the existing caravan site use on site are understood and the adaptation measures are of a relatively minor nature. Proposed Local Plan Policy WD4 provides additional safeguards. However, the need for a CCMA should be considered again when the Local Plan is reviewed or replaced, in light of any additional evidence which becomes available in the interim.

For the section between Broad Lane and the Borough boundary (Strategy unit 1), the 100 year erosion line is close to some built development at the end of Banks Rd, Park West, Seabank Rd, Riverbank Road, Cottage Lane and the Target Rd Wastewater Treatment works, but the SMP does not rule out the maintenance of existing coastal defences. The Coastal Strategy notes that predicted erosion rates are very minor along this frontage. The Shoreline Inspection report reported no change in shoreline conditions but recommends ongoing monitoring. In addition to the safeguards in proposed Local Plan Policy WD4, the Green Belt status which applies along this whole section of coast significantly limits the scope for new development, particularly residential development during the lifetime of this Local Plan.

As such designation of a CCMA would not seem to be necessary or justifiable for this section of coast in this Local Plan. However, the need for a CCMA should be considered again when the Local Plan is reviewed or replaced, in light of any additional evidence which becomes available in the interim.

2. Is the SMP policy to implement managed realignment of a section of coast? If yes, a CCMA may be a useful approach.

Leasowe Bay-Harrison Groyne

Physical Setting: Tidal foreshore, hard defences (Leasowe Revetment) offshore breakwaters (Leasowe and Sandhills Islands, Harrison Groyne)

SMP: The SMP identifies future managed realignment for a section of the North Wirral Coast between Leasowe Bay and Harrison Groyne (Policy Statement area 11a 6) in the 3rd epoch (50-100 years onwards): depending on previous studies, if practical, after defences reach the end of their effective life, allow the coast to take a more natural state. Construct set back defences if justified. Notes that there is likely to be insufficient economic justification for national funding for new defences on present alignment (as the principal assets affected are two golf courses).

Wirral Coastal Strategy: (Strategy Unit 9). The preferred option for this unit was Option 2, with the costs of maintenance works in the first two epochs met from coastal defence revenue or other budgets. This option comprises the following elements

0-20 years	20-50 year	50-100 years
Maintain existing linear defences and beach control	Maintain existing linear defences and beach control	•Maintain existing beach control structures

structures	Structures	•Leave existing defences in place but don't maintain and allow beach levels to naturally change
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In discussion it was noted that in this unit there is a need for management arrangements over the next fifty years to gradually evolve from an artificially defended position to a more naturally functioning system. This should include encouraging the dune development that is currently taking place, rather than taking measures to remove it or, if material is removed, making sure it remains within the beach/dune system where it can contribute to the overall geomorphological objectives for the frontage.

The present defences were originally erected and then subsequently reconstructed at times when prioritising of investment in coastal defence was not a significant issue. However it is clear, due to the lack of significant assets located behind the defences that any works to sustain or improve the defences would receive no or only minimal public grant aid support in the future. Accordingly management actions should be focussed on smaller scale works that can be funded from local revenue or other budgets.

The Strategy considered that early consideration however needs to be given to options for dealing with the existing defences. The present defences are, with appropriate maintenance, considered likely to last for the next 50 years. However, although at the present time the cost of physical removal of the defences is likely to be cost prohibitive, opportunities could arise that allow for recycling of material from parts of the revetment in the future, which could significantly reduce the cost of removal/reshaping.

The Strategy also highlights the need to work with local landowners, particularly the Wallasey and Leasowe Golf Clubs, and inform the wider public as to why changes are taking place and to encourage support for development of the on-going management strategy. The Strategy goes on to note that developing arrangements for management of the shoreline from a policy of artificially protecting the shoreline to one of providing for a more naturally functioning beach and dune system will require co-operation and liaison internally within the Council and externally between the Council, who will need to act as facilitator/promoter, and private bodies affected by the management proposals. Early liaison and development of channels of communication is considered essential if policy implementation is to take place smoothly.

The present coastal defence structures facilitate ease of access along the coast for the general public without limitation due to tides. Maintenance of this access along the frontage is likely to be a key requirement of any future management arrangements.

NCERM mapping identifies a maximum retreat distance of 97m under the managed realignment scenario.

Shoreline Inspection Report 2021: observed that movement of rocks along the crest of Leasowe Island breakwater – requires remedial attention; Generally unchanged conditions in Leasowe Bay and along Leasowe Revetment with - Muddy soft beach off east roundhead of Sandhills Island; Shore link to Leasowe Island remaining covered; Intermittent scour ponds along toe of Leasowe Revetment linked to runnels by cross shore rip channels; Leasowe Revetment runnels intercepted at Harrison groyne; Generally disjointed arrangement of inshore ridges and runnels along Leasowe Revetment associated with interface with beach structures and growth of beach here; Algal growth on lower revetment and scour channel along toe across western part of Leasowe revetment continues to restrict direct access to

beach; Beach growth, burying rock armour and “reef” units at landward interface of Harrison Groyne with shoreline and Embryo dunes at east end of Leasowe Revetment continuing to re-establish. Current assent from Natural England for raking of the beach and removal of debris here expired in March 2021 so no management actions have been undertaken this year. Need for beach management plan to be developed for this area;

Landownership: Wirral Council; Leasowe Golf Club; Wallasey Golf club

Existing Local Plan designation: UDP – Green Belt/Site of Biological Importance (Wallasey Golf Club)/ Countryside Recreation site (Gunsite). Urban Greenspace (Derby Pool) Tourism Development Site (pre-dates current Derby Pool pub/restaurant), coastal zone

Proposed Local Plan 2020-2037 designation – Green Belt/Open space designations retained. Tourism development designation not retained. Local Wildlife site (Wallasey Golf Club). ~~UDP Coastal zone designation not retained~~ UDP Coastal Zone designation not retained in emerging Local plan as superseded in national planning policy by CCMA approach. Proposed Local Plan Policy WD4 will state that development proposals within areas likely to be affected by coastal erosion will only be permitted where it can be demonstrated that erosion or landslip are not likely to occur during the lifetime of the development and it is therefore safe, in line with national policy. Derby Pool within study area of New Brighton Masterplan currently in preparation, but residential development not expected to form part of their proposals.

Planning applications: No recent significant planning applications

Infrastructure: none additional to coastal defences

Neighbouring Authority Implications: none

Summary: Main assets affected are the two golf courses and Derby Pool pub/restaurant. Given the preferred option in the Coastal Strategy is to retain the defences in situ, it is possible that the existing defences could continue to perform effectively well into the 3rd epoch. No detailed study into possible managed realignment has been commissioned. In addition to the safeguards in proposed Local Plan Policy WD4, the Green Belt status of the Wallasey and Leasowe Golf Clubs significantly limits the scope for any permanent built development in this location during the lifetime of this Local Plan.

Given this, designation of a CCMA would not seem to be justified or necessary in this location in this Local Plan. However the need for a CCMA should be considered again when the Local Plan is reviewed or replaced, in light of any additional evidence from monitoring or the work envisaged in the Coastal Strategy which becomes available in the interim or changes in national policy in relation to the funding of coastal defences.

3. Will shoreline change be significant over the next 100 years? For example, will it have an important impact on development or land use economically, socially or environmentally? If yes, a CCMA may be a useful approach.

Discussed above under each section of coast.

Shorefields/New Ferry Cliffs

Although this section of coast is subject to an SMP policy of hold the line, it is assessed here because of its inclusion in the existing UDP as an area at risk of coastal erosion.

Physical Setting:

SMP policy is hold the line for all epochs.

Wirral Coastal Strategy: (strategy Unit 13 – which includes Rock Park to the north) The preferred option for this unit is Option 3, with capital works carried out in the short term to the Rock Park frontage, Partnership funded, with the balance being made up from FDGiA. Future capital works to be carried out subject to available public/private funding being available. Option 3 is summarised in the table below:

0-20 years	20-50 years	50-100 years
Maintain existing public and private linear defences	Maintain existing public and private linear defences	Maintain existing public and private linear defences
Improve linear defences to Rock Park to accord with regeneration proposals	Improve linear defences as necessary.	Improve linear defences necessary.
	Provide secondary flood protection measures, as necessary	Provide secondary flood protection measures, as necessary

NCERM mapping suggests a maximum retreat distance of 40 metres in the long term but under a no active intervention scenario.

Shoreline inspection report 2021: Frontage not included. The most recent inspection that included this section of frontage (2015) noted that there were no changes in beach conditions, no further cliff erosion identified and no obvious change in conditions along cliff top or signs of new slippage. It considered that there does not appear to be any immediate threat to the properties and the frontage is probably only vulnerable to toe disruption due to extreme events such as occurred in winter 2013-14. However continued monitoring is appropriate to identify early onset of change that could trigger changes in behaviour.

Landownership:

Existing Local Plan designation: UDP: top of the cliffs are urban Greenspace and coastal zone. Foreshore is SSSI/Special Protection Area. UDP includes a map in the written statement identifying the land liable to erosion suggesting a projected recession rate of 0.5m per year. The map is linked to Policy CO5 (Development requiring additional coastal defence works) and Policy CO6 (Development within areas at risk of coastal erosion).

Proposed Local Plan 2020-2037 designation: top of the cliffs to retain open space designation. Foreshore to remain SSSI/Special Protection Area. UDP Coastal Zone designation not retained in emerging Local plan as superseded in national planning policy by CCMA approach. Proposed Local Plan Policy WD4 will state that development proposals within areas likely to be affected by coastal erosion will only be permitted where it can be demonstrated that erosion or landslip are not likely to occur during the lifetime of the development and it is therefore safe, in line with national policy

Planning applications: no significant planning applications other than householder applications for house extensions etc

Infrastructure:

Neighbouring Authority Implications: none

Summary: given hold the line policy and open space designation of the land at the top of the cliffs which will limit the potential for additional permanent development, plus the safeguards included in the proposed Local Plan Policy WD4, designation of a CCMA would not seem to be justified in this Local Plan. However the need for a CCMA should be considered again when the Local Plan is reviewed or replaced, in light of any additional evidence from monitoring etc which becomes available in the interim.