

Joint Local Plan Review for West Dorset, Weymouth and Portland

COASTAL CHANGE BACKGROUND PAPER
PREFERRED OPTIONS CONSULTATION VERSION

AUGUST 2018

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1. Introduction

PURPOSE OF BACKGROUND PAPER

- 1.1 This document is one of a number of background papers produced to support the West Dorset, Weymouth & Portland Local Plan Review.
- 1.2 This paper provides a general overview of issues relevant to coastal change. It is a working document which will be updated as evidence is acquired and the consultation process proceeds.

LOCAL PLAN AND THE REVIEW

- 1.3 In October 2015, West Dorset District Council and Weymouth & Portland Borough Council adopted their Joint Local Plan¹. The Local Plan sets out a long term planning strategy for the area and includes detailed policies and site proposals for housing, employment, leisure and infrastructure. The adopted Local Plan is the main basis for making decisions on planning applications.
- 1.4 In his report on the examination of the Joint Local Plan², the Inspector indicated that he considered it to be "imperative that an early review is undertaken". The objective of the review is to identify additional housing land capable of meeting housing need to 2036, identify a long-term strategy for development in the Dorchester area by 2021; and reappraise housing provision in Sherborne.
- 1.5 If a review is absent, or the Local Plan becomes silent or out of date because of a lack of progress, the presumption in favour of sustainable development applies and the councils would have less control in determining where development goes. Failure to undertake a review or even start it promptly would be likely to increase the risk of developers submitting planning applications at an early stage.

¹ West Dorset, Weymouth & Portland Local Plan (Adopted 2015) www.dorsetforyou.gov.uk

² West Dorset, Weymouth & Portland Local Plan Examination Inspector's Report www.dorsetforyou.gov.uk

2. National Policy and Guidance

- 2.1 National policy on coastal change is set out in the revised National Planning Policy Framework (NPPF), which was published in July 2018, with additional guidance provided in the Planning Practice Guidance (PPG)³.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (2018)

- 2.2 The NPPF has adopted the concept of adaptation as a means of delivering sustainable coastal change solutions within the land use planning system for England. The relevant parts of the NPPF are set out below:

Para 166 In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land / sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.

Para 167 Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impact 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:

- be clear as to what development will be appropriate in such areas and in what circumstances; and*
- make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.*

Para 168 Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:

- It will be safe over its planned lifetime and will not have an unacceptable impact on coastal change;*
- The character of the coast including designations is not compromised ;*
- The development provides wider sustainability benefits; and*
- The development does not hinder the creation and maintenance of a continuous signed and managed route around the coast.*

Para 169 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

³ National Planning Practice Guidance <https://www.gov.uk/government/collections/planning-practice-guidance>

a potentially unacceptable level of future risk to people and the development.

PLANNING PRACTICE GUIDANCE (PPG)

- 2.3 The PPG reiterates the aims of the NPPF, and amongst other things provides guidance on the definition of Coastal Change Management Areas.
- Coastal Change Management Areas (CCMAs) are areas identified in Local Plans as likely to be affected by coastal change (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).
 - CCMAs do not need to be defined where the accepted shoreline management plan policy is to hold or advance the line.
- 2.4 The PPG also provides guidance on the management of development in CCMAs including criteria for decision making.
- Essential infrastructure (transport and utility infrastructure necessary in areas of risk) may be permitted in a CCMA, provided there are clear plans to manage the impacts of coastal change.
 - Within the short-term risk areas (i.e. 20-year time horizon) only a limited range of types of development directly linked to the coastal strip, such as beach huts, cafes / tea rooms, car parks and sites used for holiday or short-let caravans and camping – all with time-limited planning permissions.
 - Within the medium (20 to 50-year) and long-term (up to 100-year) risk areas, a wider range of time-limited development, such as hotels, shops, office or leisure activities requiring a coastal location and providing substantial economic and social benefits to the community, may be appropriate. Other significant development, such as key community infrastructure, is unlikely to be appropriate unless it has to be sited within the coastal change management area to provide the intended benefit to the wider community and there are clear, costed plans to manage the impact of coastal change on it and the service it provides.
 - Permanent new residential development will not be appropriate within a coastal change management area.
 - Formally allocating land in Local Plans for relocation of development and habitat affected by coastal change may be appropriate in some instances. An approach that takes into account the exceptional circumstances of having to replace existing development at risk of coastal change by granting planning permissions where normally they would be refused may be more suitable for some coastal authorities.

3. Evidence and Research

SHORELINE MANAGEMENT PLAN 2 (SMP2)⁴

- 3.1 The Durlston Head to Rame Head Shoreline Management Plan 2 (SMP2) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. These risks are identified in three time horizons (up to 20, 50 and 100 years) and include maps showing the geographical extent of each risk area.
- 3.2 The SMP identified that it will not be technically, economically or environmentally sustainable nor indeed desirable, to defend all locations against future coastal change. Limited public funding in the future also means continuing to defend all areas that currently benefit from coastal defences will not be affordable.
- 3.3 As such, the SMP2 identifies four management policies, these are:
- Hold the line;
 - Advance the line;
 - Managed realignment; and
 - No active intervention.

COASTAL CHANGE ADAPTATION PLANNING GUIDE (2015)⁵

- 3.4 Recognising the need to consider adaptation as a means of helping deliver more sustainable shoreline management solutions, Defra led a national Coastal Change Pathfinder (CCP) programme which ran between 2009 and 2011, it explored new ways of adapting to coastal change.
- 3.5 In order to help promote a consistent and systematic approach to the development of CCMAAs, Defra funded development of a new Coastal Change Adaptation Planning Guide which was published in 2015. This sought to draw together the lessons and best practice from the CCP programme and other similar projects and initiatives.
- 3.6 This provides a user-friendly guide for coastal practitioners involved in managing coastal change and implementing the NPPF. It provides solutions tailored to locally-specific options and a consistent process for establishing CCMAAs.
- 3.7 The guidance recommends the application of a four-stage approach.
- Stage 1: Reviewing Shoreline Management Plan Policies

⁴ Durlston Head to Rame Head Shoreline Management Plan 2 (SMP2) <http://www.sdacag.org/>

⁵ Coastal Change Adaptation Planning Guide (2015) <https://coastalsig.files.wordpress.com/2013/02/ccapg-august-2015.pdf>

- Stage 2: Identifying Risk
- Stage 3: Mapping Areas of Risk
- Stage 4: Delivering Adaptation through Planning

COASTAL RISK PLANNING GUIDANCE FOR WEST DORSET, WEYMOUTH & PORTLAND (CPRG)⁶

- 3.8 This CPRG follows the four-stage approach identified above.
- 3.9 Stage 1: The Shoreline Management Plan policies relating to each of the 33 separate sections of the coastline within West Dorset and Weymouth & Portland are reviewed.
- 3.10 Stage 2: The guidance identifies various coastal change processes based on information contained in the Shoreline Management Plan, National Coastal Erosion Risk Mapping and more recent studies completed post-SMP. The CPRG provides a description of the nature of the coastal change risks including the nature of the hazards and the timing and frequency of the risks occurring. The CPRG predicts the potential future cliff recession in each area over the next 20, 50 and 100 years.
- 3.11 Stage 3: Each section of the coast is mapped showing the 20 year, 50 year and 100 year recession extents.
- 3.12 Stage 4: The guidance also makes recommendations for development management including:
- development restrictions setting out where different types of appropriate development should or should not occur based on the risk zones;
 - the evidence required to support planning applications for different types of development within different risk zones; and
 - future planning policy recommendations.

REVIEW OF ROLLBACK

- 3.13 In July 2016, Defra produced a paper which evaluated the process of rollback in Coastal Change Pathfinder projects. The evidence from these projects suggests that rollback with the right policies and mechanisms in place, is a feasible adaptation option and that is desirable from the perspective of the local authority and the individuals at imminent risk of coastal erosion. However, the review established a number of barriers, principally:

⁶ Coastal Risk Planning Guidance for West Dorset, Weymouth & Portland (2013)
<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland-planning-policy/evidence-base/evidence-base-document-list-west-dorset-weymouth-portland.aspx>

- Availability of land – difficulty in obtaining land for relocating assets that is both suitable and affordable to the asset owner and the wider community; and
- Obtaining consent to development land – in order for rollback to be feasible, it is vital that planning consent is obtained to allow assets to be relocated inland.

4. Current Approach

COASTAL EROSION AND LAND INSTABILITY: POLICY ENV 7

- 4.1 Coastal change management is dealt with by Policy ENV7 in the adopted local plan. The general principle of the current approach is to direct new development away from areas vulnerable to coastal erosion and land instability unless it can be demonstrated that the site is stable or can be made stable. The areas of coastal change are shown on the policies map.
- 4.2 The policy states:
- i. New development will be directed away from areas vulnerable to coastal erosion and land instability to avoid putting people at risk unless it can be demonstrated that the site is stable or could be made stable, and that the development is unlikely to trigger landsliding, subsidence, or exacerbate erosion within or beyond the boundaries of the site.
 - ii. The councils will identify Coastal Change Management Areas through a policy document based on the Shoreline Management Plan and supporting evidence. Within these areas no new development will be permitted for residential or similarly occupied uses. The replacement of properties affected by coastal change may be permitted within a defined area agreed through a community relocation strategy as an exception to normal policy.
- 4.3 Policy ENV7 recognises that further work is necessary and proposes to identify Coastal Change Management Areas (CCMAs) based on the Shoreline Management Plan and supporting evidence.

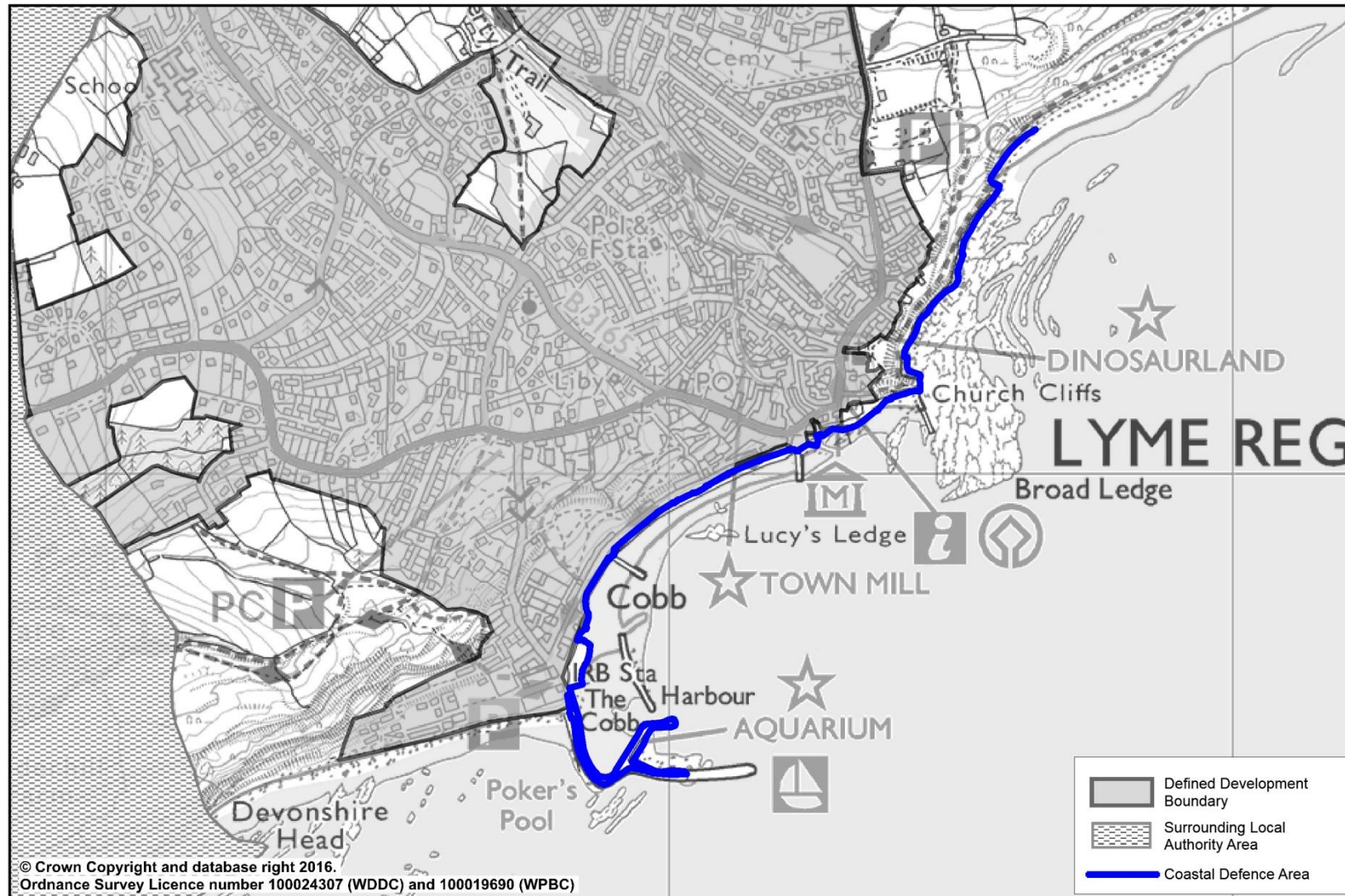
5. Reason for Change

- 5.1 Identifying Coastal Change Management Areas and the forms of development and associated infrastructure that are appropriate within them is necessary to comply with national policy.
- 5.2 To fully comply with the requirements of national policy, the Local Plan should also consider the case for making provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.

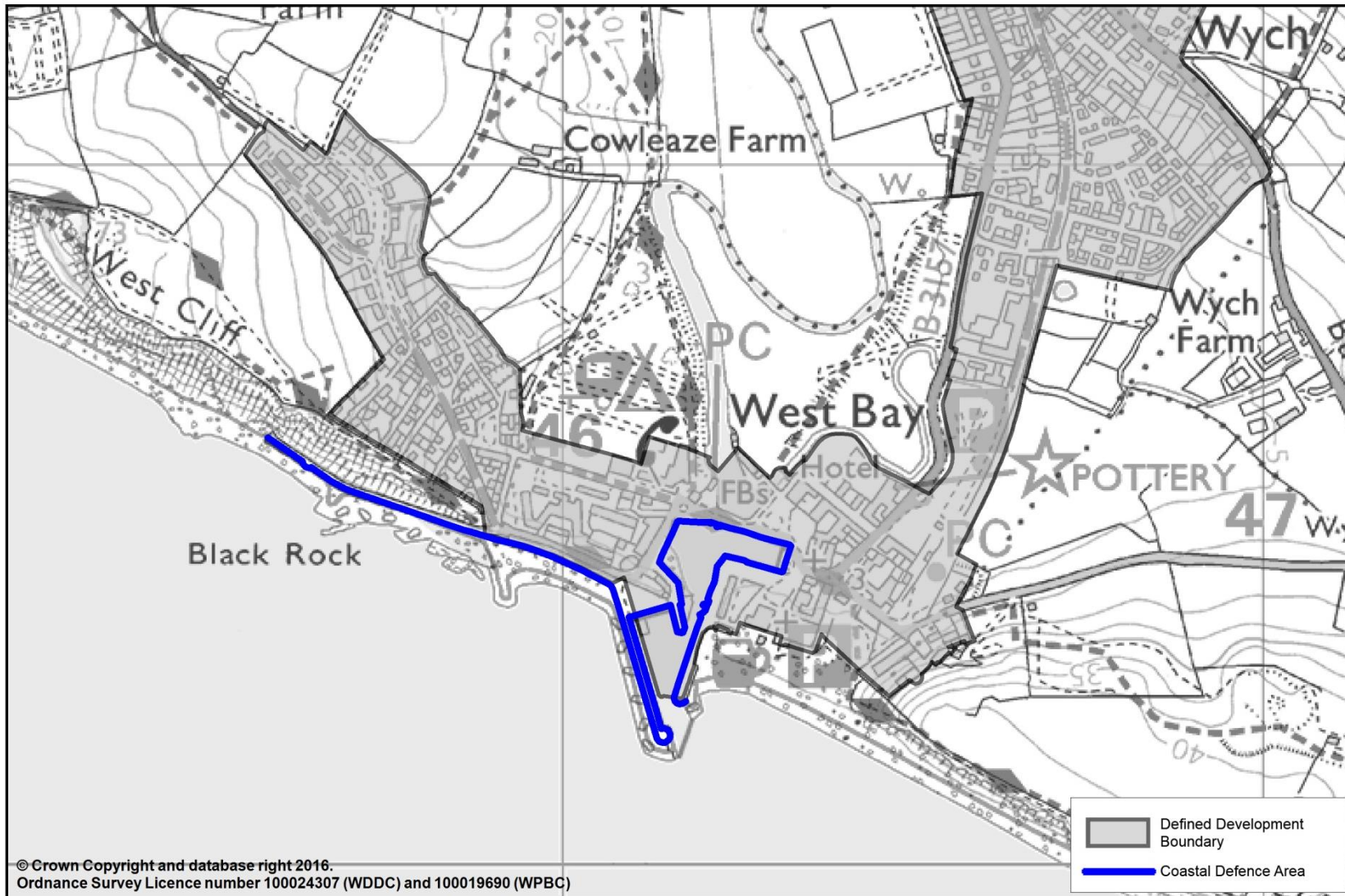
6. Proposed Approach

- 6.1 The councils propose to follow the recommendations of the Coastal Risk Planning Guidance by designating the majority of the West Dorset and Weymouth & Portland Coastline as a CCMA in the Local Plan Review. This approach suits the nature and extent of risk across the plan area coastline.
- 6.2 The defended areas of Weymouth Town Centre, West Bay Harbour and Lyme Regis Harbour where the SMP policy is to hold or advance the line would not form part of the Coastal Change Management Area. The full extent of each defended area are shown in Maps 6.1-6.3.

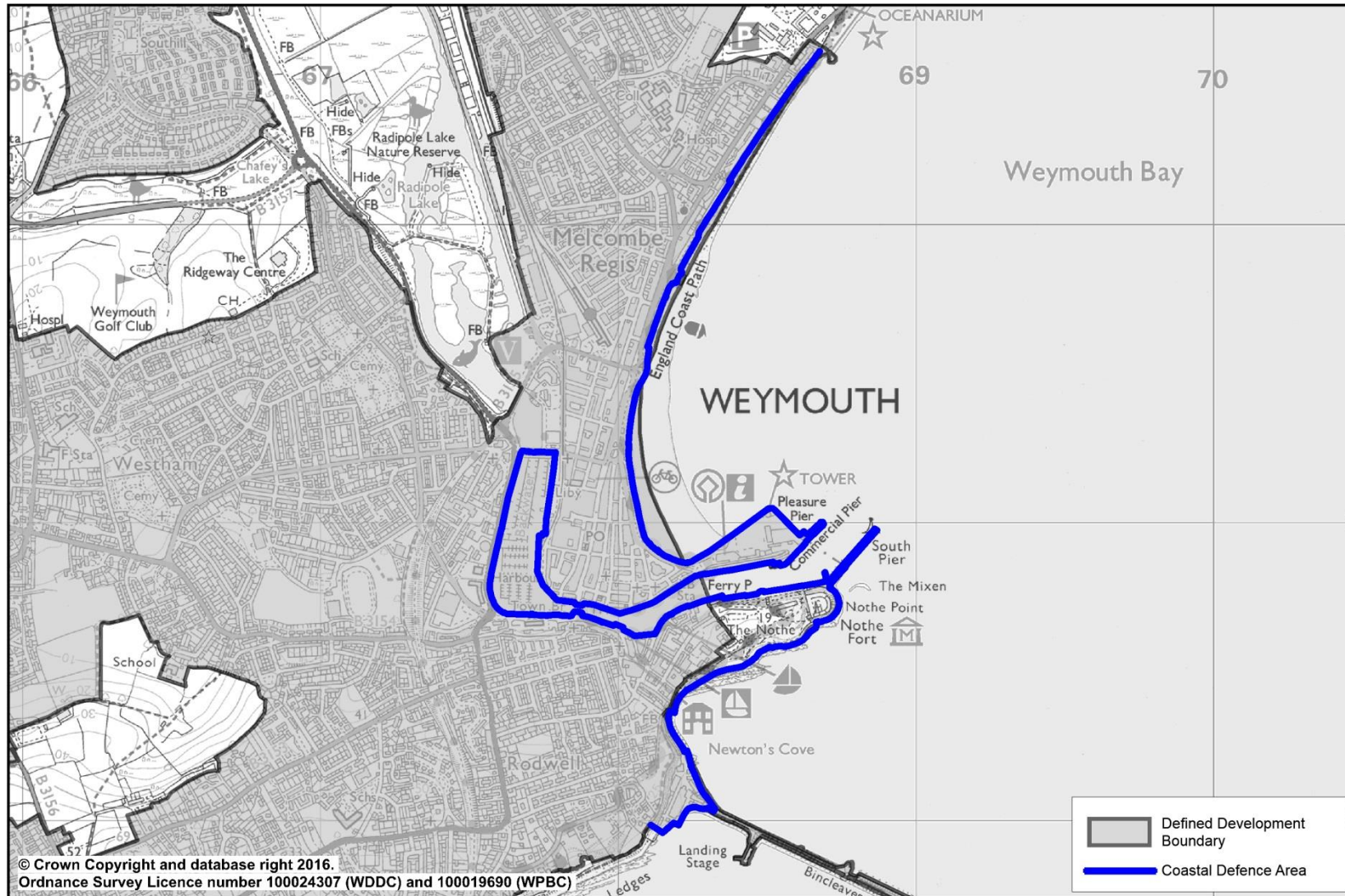
MAP 6.1: AREA EXCLUDED FROM CCMA (LYME REGIS HARBOUR)



MAP 6.2: AREA EXCLUDED FROM CCMA (WEST BAY HARBOUR)



MAP 6.3: AREA EXCLUDED FROM CCMA (WEYMOUTH HARBOUR)



6.3 The first question in the issues and options consultation is whether this approach should be followed.

24-i. Do you agree that all parts of coastline except for the defended areas of Weymouth Town Centre, West Bay Harbour and Lyme Regis Harbour should be designated as a Coastal Change Management Area?

6.4 The second question deals with the choice of appropriate development in areas of coastal change. The proposed approach is to follow the suggested criteria from national planning guidance.

Figure 6.1: Approach to development within CCMA's

RISK OF COASTAL EROSION	APPROPRIATE DEVELOPMENT	EXAMPLES
Immediate (20 year time horizon)	Limited range of types of development directly linked to the coastal strip. Time-limited planning permission only	Beach huts, cafes/tea rooms, car parks and sites for holiday or short-let caravans and camping This excludes permanent residential development
Medium (20 to 50 year time horizon)	Wider range of types of development with time limited planning permission	Hotels, shops, office or leisure activities requiring a coastal location and providing substantial economic and social benefits to the community. This excludes permanent residential development
long-term (up to 100-year time horizon)		

24-ii. Should the council limit the type of development that should or should not occur in the CCMA as set out in Figure 22.1 (of the Issues and Options document)?

6.5 The third and fourth questions ask how to deal with development that already exists in areas vulnerable to coastal change and instability. The proposed approach is to facilitate the relocation of affected property (e.g. houses, farmsteads, commercial premises) further inland through roll back policies which seek to provide flexibility to enable development that would not normally be permitted in undeveloped coastal locations.

24-iii. Should the council introduce a rollback policy to allow development threatened by coastal erosion to obtain planning permission to be replaced and relocated further inland?

24-iv. If so, should the council restrict the types of development which can roll back?

- 6.6 In some undefended areas, for instance along the north-western shore of Portland Harbour, the rate of coastal erosion is likely to result in the loss of residential properties, roads, commercial premises e.g. caravan / holiday parks and coastal footpaths. The final question asks how to deal with areas of the coastline where the impacts and potential loss of existing assets are most acute.

24-v. In areas where the risk to assets is most acute, should the councils formally allocate land for the relocation of development, infrastructure and habitat affected by coastal change?

7. Issues and Options Consultation Responses

7.1 The questions asked at the issues and options stage relating to Coastal Change are set out below. A total of 14 responses were received. The individual comments were broken down as follows:

- Number of comments made: 35
- Object: 13
- Support: 14
- Neutral: 8

7.2 A summary of issues raised by the public and stakeholders has been added under each question. A full report of the Issues & Options consultation is also available⁷.

24-i. Do you agree that all parts of coastline except for the defended areas of Weymouth Town Centre, West Bay Harbour and Lyme Regis Harbour should be designated as a Coastal Change Management Area?

COMMENTS RECEIVED RELEVANT TO QUESTION 24-i

7.3 The public responses were generally supportive of the principle that all parts of coastline except those already protected, should be designated as a Coastal Change Management Area.

7.4 This question was supported by Bradpole Parish Council & Ryme Intrinsic Parish Council.

HOW THESE ISSUES HAVE BEEN ADDRESSED?

7.5 The comments support the principle of the Coastal Change Management Area being defined for all parts of coastline except for the defended areas of Weymouth Town Centre, West Bay Harbour and Lyme Regis Harbour.

24-ii. Should the council limit the type of development that should or should not occur in the CCMA as set out in Figure 22.1 (of the Issues and Options document)?

COMMENTS RECEIVED RELEVANT TO QUESTION 24-ii

7.6 The public responses were generally supportive of a restriction on development that would be acceptable in Coastal Change Management Areas due to the sensitive nature of the coastal environment. One respondent raised concern that

⁷ West Dorset, Weymouth & Portland Summary of Responses to the Initial Issues & Options Consultation (August 2017) www.dorsetforyou.gov.uk

the 20 year timeframe for allowing a wider range of development types is not long enough.

- 7.7 This question was supported by Bradpole Parish Council & Ryme Intrinseca Parish Council.

HOW THESE ISSUES HAVE BEEN ADDRESSED?

- 7.8 It is not proposed to change the list of appropriate development in CCMA's given that the responses were generally supportive in nature.

24-iii. Should the council introduce a roll back policy to allow development threatened by coastal erosion to obtain planning permission to be replaced and relocated further inland?

COMMENTS RECEIVED RELEVANT TO QUESTION 24-iii

- 7.9 There was general support from the public for a roll back policy but one respondent raised concern that it might lead to market distortion.
- 7.10 Bourne Leisure who are a key landowner in areas which are susceptible to coastal erosion consider that the roll back policy should also include holiday accommodation. Natural England would like to ensure that any roll back policy takes account of the environmental protection afforded to a designated area.
- 7.11 Bradpole Parish Council did not support the principle of a rollback policy but did not offer an explanation for their objection.

HOW THESE ISSUES HAVE BEEN ADDRESSED?

- 7.12 It is proposed to include a policy in the Local Plan Review which allows development threatened by coastal erosion to obtain planning permission to be replaced and relocated further inland.

24-iv. If so, should the council restrict the types of development which can roll back?

COMMENTS RECEIVED RELEVANT TO QUESTION 24-iv

- 7.13 The issues and options consultation document suggests that the roll back policy could facilitate the relocation of houses, farmsteads and commercial premises in areas affected by coastal erosion. There was general support to restrict the policy to these uses.
- 7.14 Bourne Leisure considered that holiday accommodation should be included in the list of restricted uses which could roll back.

HOW THESE ISSUES HAVE BEEN ADDRESSED?

- 7.15 The policy will be supportive of proposals requiring a coastal location such as tourist related activities. However, in all instances, proposals will be subject to a time-limited planning consent.

24-v. In areas where the risk to assets is most acute, should the councils formally allocate land for the relocation of development, infrastructure and habitat affected by coastal change?

COMMENTS RECEIVED RELEVANT TO QUESTION 24-iii

- 7.16 There was general support from the public responses to formally allocate land in areas where risk to assets is most acute.
- 7.17 However, Bridport Town Council was concerned over the potential for roll back in sensitive coastal locations such as the World Heritage Coastline. Yetminster and Ryme Intrinsic Parish Council also objected to this principle. Bourne Leisure considered that it would not be appropriate for the councils to identify and allocate land at this stage as the needs of the tourism industry change over time, specifically the types of uses that need to be planned for.

HOW THESE ISSUES HAVE BEEN ADDRESSED?

- 7.18 In order to avoid conflict with the Local Plan Review settlement strategy, it is not proposed to formally allocate land for the relocation of development in the areas where risk is most acute. Instead, proposals would be considered on their own merits owing to the circumstances of the landholding and location.

8. Preferred Options Consultation

- 8.1 The Issues and Options consultation raised a number of general questions about how a policy for Coastal Change Management Areas could be defined including the extent and scope of development within areas subject to coastal change.
- 8.2 Taking on board the comments made at Issues and Options stage, the Preferred Options consultation includes three policies (Policies ENV7 to 9).

LAND INSTABILITY

- 8.3 ENV7 is an adaptation of the previously adopted policy ENV7. The supporting text of the new policy introduces more detail on how proposals in Charmouth and Lyme Regis will be assessed as these two areas are known to have high levels of slope instability.
- 8.4 Table 2.4 of the Preferred Options Consultation Document introduces four Slope Instability Zones which apply to the Lyme Regis and Charmouth areas on the policies map. Zone 1 is the lowest degree of hazard and zone 4 is the highest. Development proposals within zones 2-4 will need to be accompanied by a ground stability report. In zone 4, development will not be permitted in all but the most exceptional cases.

ENV7. LAND INSTABILITY

- i) New built development will be directed away from areas subject to land instability or potential land instability to avoid putting people at risk unless it can be demonstrated that the site is stable or could be made stable, and that the development is unlikely to trigger landsliding, subsidence, or exacerbate erosion within or beyond the boundaries of the site.**
- ii) Proposals for built development in the Lyme Regis and Charmouth Land Instability Zones shown on the policies map will not be permitted unless the all the following criteria can be met:**
 - Proposals for development in zones 2, 3 and 4 are accompanied by an appropriate ground stability report prepared by a suitably qualified and experienced engineer demonstrating that the development can be carried out safely, including any mitigation and stabilisation measures necessary to ensure there would be no adverse effect on slope stability both on and surrounding the site;**
 - Development in Zone 3 comprising regularly occupied premises will not be permitted unless there are no suitable alternative sites in lower hazard Slope Instability Zones; and**
 - Development in Zone 4 will not be permitted unless it is essential**

transport and utilities infrastructure that cannot be provided on suitable alternative sites in lower Slope Instability Zones.

COASTAL EROSION AND COASTAL CHANGE MANAGEMENT AREA (CCMA)

- 8.5 Responses from the Issues and Options consultation agreed the proposed Coastal Change Management Area should follow the entire coastline, except for the defended areas of Lyme Regis Harbour, West Bay Harbour and Weymouth Harbour. In these areas the Shoreline Management Plan position is to ‘Hold the Line’.
- 8.6 Together, new Policy ENV8 and Table 2.5 of the Local Plan Review Preferred Options set out what development will be appropriate within the Coastal Change Management Area.
- 8.7 Permanent residential development resulting in the creation of a new residential dwelling will not be permitted as the CCMA area covers the extent of risk over a 100 year period, the same lifespan as new-build residential development.
- 8.8 Irrespective of the extent of risk, any development proposal that is permitted will be subject to a time-limited permission and must require a coastal location. This approach does not preclude tourism development which was identified as an important feature of the coastline through the Issues and Options consultation. For development proposals in areas where there is medium or longer-term erosion risk, it will be important to also explain the economic and social benefits of any proposal.
- 8.9 Extensions to residential dwellings that don’t result in the creation of a new dwelling unit may be supported, but clearly any extension is undertaken with risk.

ENV8. NEW BUILT DEVELOPMENT WITHIN THE COASTAL CHANGE MANAGEMENT AREA

- i) Within the Coastal Change Management Area defined on the policies map, new permanent residential development resulting in the creation of a new residential dwelling unit will not be permitted. Any development that is permitted will be subject to a time-limited permission. Extensions to existing residential properties may be appropriate.**
- ii) In areas at immediate risk of coastal erosion (i.e. within 20 years), development will be limited to short-term uses requiring a coastal location.**
- iii) In areas at medium or long-term risk of coastal erosion (i.e. between 20 and 100 years), development will be limited to uses requiring a coastal location and which provide substantial economic and social benefits to the community.**

- 8.10 New Policy ENV9 relates to the replacement of existing dwellings and farm buildings within the Coastal Change Management Area. The replacement and relocation further inland of other forms of built development (including tourist and commercial operations and associated infrastructure) will be determined against the policies in the development plan.
- 8.11 The CCMA policy does not allocate land for roll-back, instead, development proposals are required to be relocated within or on the edge of the nearest settlement with a defined development boundary, or to the nearest settlement with a population of 200+. This approach is in general conformity with the settlement strategy.

ENV9. REPLACEMENT OF EXISTING DWELLINGS AND FARM BUILDINGS WITHIN THE COASTAL CHANGE MANAGEMENT AREA

- i) **The replacement of residential dwellings (including agricultural dwellings) and farm buildings at immediate or medium-term risk from coastal erosion (i.e. within the next 50 years) located within the Coastal Change Management Area defined on the policies map, will be permitted provided that:**
- any existing dwelling is permanent and occupied on a permanent residential basis and any existing farm building is in agricultural use;
 - any replacement dwelling should have a life expectancy of at least 100 years and a gross volume that is no larger than the dwelling it replaces, taking account of permitted development rights associated with the existing dwelling;
 - any replacement non-agricultural dwelling is located outside the Coastal Change Management Area and either: within or adjoining a nearby settlement with a defined development boundary; or within or adjoining the built-up area of a nearby settlement of more than 200 population;
 - any replacement agricultural dwelling and / or farm building is located elsewhere on the farm holding outside the Coastal Change Management Area and it can be demonstrated that the replacement dwelling and / or farm building will be used for agricultural purposes;
 - any replacement dwelling / farm building is of a design that respects the character and appearance of the new development site, its immediate setting and its wider surroundings; and
 - the existing dwelling / farm building is demolished and the site restored within three months of occupation of the replacement dwelling / farm building.

8.12 The Preferred Options Consultation Document also includes Question 2-viii which seeks views on the proposed approach in new Policies ENV7, 8 and 9.

2-vii Former Policy ENV7 has been replaced by a separate policy (new Policy ENV7) on land instability, which includes more detail on how proposals for development in the Charmouth and Lyme Regis Land Instability Zones will be assessed. More detailed policies (new Policies ENV8 and 9) have been drafted to set out the approach to development proposals at risk from coastal erosion. Do you have any comments on new Policies ENV7 to 9?