



Planning for Development and Coastal Change

Impact Assessment



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Summary: Intervention & Options		
Department /Agency: Communities and Local Government	Title: Impact Assessment of Planning Policy on Development and coastal change	
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What is the problem under consideration? Why is government intervention necessary?

Problem: Coastal change, as exacerbated by climate change, has implications for development on the coast and is therefore a major consideration for spatial planning in shaping places to adapt to climate change. Coastal environments have changed continuously through human history. However, climate change and forecasted sea level rises could mean a potentially considerable impact on erosion rates and coastal flooding on undefended coasts, increasing the risk of changes to the coastline, with a knock-on impact on business and communities in such areas. It also raises questions as to the sustainability of maintaining some of our coastal defences in the long term.

Rationale for intervention: In the absence of full information, current planning policy in PPG20 placed a restriction on any development in areas at risk of coastal erosion. We now have improved information about coastal changes (from the Environment Agency) and it is, therefore, right that the planning policy should adapt so that, in the light of this evidence, more efficient decisions can be made and development that is beneficial can go ahead, which in the counterfactual might not have.

What are the policy objectives and the intended effects?

The main aim of the planning policy is to ensure that our coastal communities continue to prosper, but in a way that manages and adapts to the impacts of coastal change. To do this the planning policy will:

- strike the right balance between economic growth and the need for further defence of the coastline
- reduce the adverse consequences of coastal change on people, property, infrastructure, businesses, habitats and the historic environment and
- facilitate a more strategic risk-based approach to managing future physical changes to the coast, so that long-term adaptation of communities can be planned to avoid blight, whilst allowing necessary development that is appropriate and safe

This approach, supported by better information, will allow a more evidence-based approach to planning and investment at the coast, and in doing so ensure better decisions are made and welfare improved.

What policy options have been considered? Please justify any preferred option.

Option 1: Do nothing (not change current policy in light of new information)

Option 2: Introduce new planning policy on coastal change and to support it with a new practice guide.

Preferred option is option 2. This is based on the Government’s objectives for the planning system, and how planning should facilitate and promote sustainable patterns of development, mitigating the effects and adapting to the impacts of climate change. For the reasons set out in the attached evidence base, by mainstreaming coastal change risk within the planning process now, much time and resource will be saved in the future, making peoples lives safer and minimising the adverse economic and social impacts by helping coastal communities adapt.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

12 to 18 months after publication of final planning policy. We will then assess the appropriateness and consistency in implementation, and evaluate the extent to which the planning policy has achieved its proposed outcomes.

Ministerial Sign-off for final proposal stage impact assessments:

I have read the impact assessment and I am satisfied that (a) this Impact Assessment represents a fair and reasonable view of the expected costs, benefits and impact of the proposed policy, and (b) that the benefits justify the costs.

Signed by the responsible minister:



Date: 9 February 2010

Summary: Analysis and Evidence

Policy Option: 2	Description: Introduce new planning policy on coastal change and to support it with a new practice guide.
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COSTS	ANNUAL COSTS		<p>Description and scale of key monetised costs by 'main affected groups'</p> <p>The administrative costs of implementing the proposed new policy will primarily fall on LPAs, the Environment Agency and developers.</p> <p>However, the LPAs and the Environment Agency, when consulted on the new policy, welcomed the clarity and flexibility that the new policy framework will provide and did not make representations about cost. There is a general acceptance that the administrative burden will not be significantly increased by the new policy as LPAs are already faced (and will continue to be, regardless of whether the policy is implemented) with situations where coastal communities are impacted by coastal change and solutions are being sought.</p> <p>There may be some costs to LPAs in relation to lack of technical ability to interpret the technical information on coastal erosion mechanisms and the administration of time limited developments. However, the number of planning applications in CCMA's is likely to be relatively small and LPAs would welcome the ability to be able to permit development that would be beneficial for coastal communities.</p> <p>There will be some costs associated with this option for developers in preparing a vulnerability assessment. However the number of planning applications within coastal change management areas is likely to be small with the majority being for small temporary development such as beach huts, car parks etc. Consultation responses on this have put the cost for a vulnerability assessment at £5,000 to £10,000 for a large development but as low as £500 for a small temporary structure. The size and cost of the assessment would vary with the size of the proposed development, but would be set against the benefits to the applicant (currently zero) from the development itself.</p>
	One-off (Transition)	Yrs	
	£		
	Average Annual Cost (excluding one-off)		
	£		
<p>Other key non-monetised costs by 'main affected groups'</p> <p>In identifying suitable alternative sites for relocation in the event of roll-back there is the opportunity cost of such sites which might have been used in a different way.</p>			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups'	
	One-off	Yrs		
	£		The key benefit is the facilitating of welfare generating (possibly time-limited) developments where appropriate which, in the absence of the policy change, would not take place. This benefit will accrue to the developers themselves, the local community and the wider economy.	
	Average Annual Benefit (excluding one-off)			
	£		Total Benefit (PV)	£
	Other key non-monetised benefits by 'main affected groups'			

Key Assumptions/Sensitivities/Risks

There will be costs to developers in producing a vulnerability assessment for any development proposed within the CCMA that the policy requires LPAs to designate (essentially the area vulnerable to coastal erosion over the next 100 years). However, given the relatively small area of the country likely to be affected, and its generally sparsely developed nature, relatively few vulnerability assessments are likely to be required.

Price Base Year	Time Period Years	Net Benefit Range (NPV) £0	NET BENEFIT (NPV Best estimate) £0
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What is the geographic coverage of the policy/option?	England			
On what date will the policy be implemented?	Early 2010			
Which organisation(s) will enforce the policy?	LPAs/EA/CLG			
What is the total annual cost of enforcement for these organisations?	£Negligible			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	N/A			
What is the value of the proposed offsetting measure per year?	£N/A			
What is the value of changes in greenhouse gas emissions?	£N/A			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase – Decrease)
Increase of £Negligible	Decrease of £0	Net Impact £Negligible

Key:	Annual costs and benefits: Constant Prices	(Net) Present Value
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Evidence Base (for summary sheets)

Introduction

1. The new planning policy on development and coastal change is intended to reinforce and clarify the role of the spatial planning system in managing the risk from coastal change to development. The policy promotes a strategic risk-based approach to managing future physical changes to the coastline, so that long-term adaptation of communities can be planned whilst allowing necessary development that is appropriate and safe. It will also introduce a more coordinated approach to planning and investment at the coast, ensuring that spatial strategies to deliver regeneration and sustainable economic development take proper account of the impact of physical processes affecting the coastline and decisions regarding the planning and management of coastal defences.
2. This impact assessment aims to inform stakeholders about the likely impacts of the policy. The consultation impact assessment has been reviewed, and information on the indicative costs of vulnerability assessments revised, following consideration of responses to the public consultation that closed on 12 October.

Rationale for government intervention

3. The Government's *Making Space for Water* strategy for flood and coastal erosion management, produced in 2004, recognises the importance of adopting a more holistic approach to managing and adapting to the increasing risk from coastal erosion. As part of this approach, the Department for Environment, Food and Rural Affairs (Defra) consulted on its *Coastal Change Policy* which set out ideas for how coastal communities can successfully adapt to the impacts of coastal change, and Government's role in supporting this. This underlines the key role that positive spatial planning has in helping communities to manage risk and adapt to an ever changing coastline.
4. The *Making Space for Water* strategy also included a commitment to improve the evidence base in this area and to provide more consistent information about where and how fast coastal erosion is likely to happen. The Environment Agency has worked together with local authorities to produce a set of local maps (shoreline management plans) and national maps showing the zones at risk of erosion for the next 100 years. These maps will provide plan makers at all levels (regional and local) with the evidence needed to allow a rational consideration of coastal erosion issues through the planning process.

5. Current policy on planning to manage coastal erosion risk is contained in Planning Policy Guidance Note 20 *Coastal Planning* (PPG20). Whilst the fundamentals of its policies remain valid, the absence of full information about the risks involved in developments in areas vulnerable to coastal change led to PPG20 adopting a strongly precautionary approach to coastal erosion risk that placed a restriction on any development within these areas. This precautionary approach reflects the state of the evidence at the time but will inevitably lead to a sub-optimal outcome whereby some development that should have taken place did not. In the face of improved information it is right that planning policy should adapt so that, in the light of this evidence, development that is beneficial can go ahead. The new policy approach promotes a risk based-approach to coastal erosion that builds on the successful principles used in PPS25 on flooding to facilitate a more joined-up and strategic approach to managing coastal risk in a sustainable way, so that long-term adaptation of communities can be planned to avoid blight, whilst allowing necessary development that is appropriate and safe.

6. PPS20 was published in 1992. With the exception of policy on coastal erosion risk, it has been superseded by subsequent planning policy statements. We consider that it is now necessary to update the approach to managing the impacts on development of physical changes to the coast. There are options for how we could do this, but we consider that the most effective way to update the policy and to deliver our white paper commitment to streamline planning would be to integrate this policy with our policy on managing the risk of flooding inland. This reflects the approach we are taking on planning for prosperous economies and the historic environment, where we are consolidating related policies into a single PPS. In the short term we propose to publish our coastal management policy as a supplement to PPS25, but our aim in the medium term is to integrate the approach more fully with the existing PPS25. This would mean that PPG20 would be cancelled.

Policy options

7. Two options are considered:
 - Option 1: Do nothing – retain the existing policy
 - Option 2: Introduce the new planning policy

Option 1: Do nothing

8. The first option is to continue as at present, keeping in place current planning policy for the coast provided in PPG20, *Coastal Planning*, published in 1992. Local authorities will still face the increasing challenges to coastal communities from climate change but will not have a planning policy framework that will enable them to adapt and ensure that coastal communities remain viable and sustainable.

Option 2: Introduce new planning policy for managing the risk from coastal change to new development

9. The proposal is to provide a clear statement of the Government's planning policy to manage the impact of coastal change to development. The policy aims to provide an appropriate response to the need for a more efficient allocation of land in the light of a better understanding of coastal erosion risk and the need to adapt to climate change and the associated increase in sea level rise.
10. The new policy arises from a Community and Local Government (CLG) commitment to update planning policy to help deliver the spatial element of the Government's strategy for flood and coastal erosion risk management *Making Space for Water*. It is intended to sit alongside Defra's *Coastal Change Policy*; together providing a comprehensive package that has supporting communities in adapting to coastal change at its heart.
11. Tackling climate change is one of the Government's highest priorities. Positive planning has an important role in helping communities manage and adapt to an ever changing coastline. The planning framework for the continuing economic and social viability of coastal communities should aim to:
 - strike the right balance between economic prosperity and reducing the consequences of coastal change on communities
 - reduce the consequences of coastal change on people, property, infrastructure, business, habitats and heritage assets and
 - facilitate a more strategic risk-based approach to managing future physical changes to the coast, so that long-term adaptation of communities can be planned to avoid blight, whilst allowing necessary development that is appropriate and safe
12. To achieve these aims, the policy promotes the use of risk-based principles by planning authorities to managing the impacts of coastal change to development and supporting the delivery of adaptive measures. It promotes a strategic approach to coastal risk management which aims to ensure that coastal change is taken into account at all stages of the planning process.
13. To deliver the aims of the policy set out in paragraph 9, the following approach is proposed:
 - consideration of the impact of coastal change should form an integral part of planning strategies and plan making at national, regional and local levels, and of decision-making on all types of application for consent required for development in areas that might be vulnerable to coastal change

- the proposed approach depends on consistent information about where and how fast coastal change is likely to happen. Shoreline management plans (SMPs) will be an integral part of this approach. SMPs will fulfil a similar role to that of a strategic flood risk assessment (SFRA), in that they will provide the means of identifying the risks for a local area and proposals on how to manage them. They would provide the evidence for designating in the local development framework (LDF) the area likely to be affected by physical changes to the coast, namely the 'coastal change management area' (CCMA), upon which future development policies should be based
- inappropriate development should be avoided in areas that are vulnerable to coastal change
 - new development should not normally be permitted in areas vulnerable to coastal change (namely the CCMA(s)) and where it would increase the risk to people's safety, increase the number of properties vulnerable to coastal change or result in an increased demand for future coast defence, or reduce options for providing compensatory habitat or natural enhancement
 - certain types of time limited developments and minor temporary uses may be permitted within the CCMA(s), having regard to the need to maintain the social and economic viability of the community and the vulnerability of the proposed development to coastal change. Such temporary development may be permitted where it can be demonstrated that it will be safe through its planned lifetime, with no additional risk to life, and it will not bring additional demands for new coastal defences or have adverse effects on the environment. The time-limit conditions should reflect the expected life of the intended use taking account of the predicted rate of coastal change
- regional planning bodies (RPBs) and local planning authorities (LPAs) should prepare and implement planning strategies that facilitate the sustainable management of areas of coast assessed to be subject to physical change. The aim should be to facilitate the adaptation of coastal communities to future physical changes to the coast and improve their resilience in a sustainable way
 - whilst physical changes to the coastline may restrict opportunities for development in affected areas in the long-term, it is important that coastal communities are able to adapt to future coastal changes through adjustments to the location of development over time and facilitating relocation of development to safer low risk areas inland
- a partnership approach between neighbouring planning authorities and other relevant agencies and bodies with an interest on the coast, such as the Environment Agency, Natural England, the National Trust, English Heritage and Coastal Groups, should be promoted in order to secure an integrated approach towards sustainable planning and management in coastal areas. This is an

essential part of the proposed approach because coastal processes (and SMPs) cross local authority boundaries

- cooperation between the LPA, the Environment Agency and other stakeholders should promote a common understanding of coastal processes and their impacts; define key issues for coastal planning; and coordinate policies for development and growth, regeneration, cultural heritage and natural environment conservation and enhancement, and flood and coastal erosion risk management and defence. This will enable positive strategic planning to deliver wider sustainability objectives
- to make the impact-based approach work in practice, we are proposing that a vulnerability assessment should be carried out on any development proposed in a CCMA. This should describe the impact from and to coastal change of the proposed development

14. We have considered additional measures to support the new policy:

Environment Agency's consultee role – We considered extending the Environment Agency's statutory consultee role to cover planning applications for proposed development located in areas that are or might be at risk from coastal change. However, we and the Environment Agency concluded that there was not a case for extending regulation now, but that the Agency should be consulted on proposals in these areas. We therefore propose to monitor whether appropriate consultation is happening. If the Environment Agency is not being adequately consulted we can then consider extending their statutory consultee role.

Call-in powers – We considered whether there is a need to widen the scope of the Consultation Direction so it covers major developments where the LPA proposes to grant planning permission, against a sustained objection from the Environment Agency on coastal change risk grounds. This would mean that a LPA could not grant permission without first referring major cases to the Secretary of State to consider whether to call-in the application, when the Agency objects to the development. We concluded that current call-in powers are adequate as they allow the Agency to ask for call-in where necessary. The Agency supports this. However, the Government will monitor planning permissions in areas that are vulnerable to coastal change to ensure that this will provide a sufficient check on inappropriate development. Should current arrangements not prove adequate the scope of the Consultation Direction could be widened at a later date.

Sectors affected

15. The sectors most likely to be affected by the new planning policy are:
- regional and local authority plan makers and the stakeholders they work with, particularly the Environment Agency and statutory planning consultees
 - developers
 - members of coastal communities affected by coastal change

Cost and benefit assessment

16. The following section provides a qualitative assessment of the costs and benefits of the options consulted upon.

Option 1: Breakdown of costs/benefits

Costs

17. The **economic** costs of the 'Do Nothing' option will include:
- constraints on land supply and development as better information on coastal change processes and their effect on the coast. In terms of the area likely to be affected, more use may be made of the precautionary principle (PPG20, 2.16), in the absence of planning tools to help LPAs manage the impacts of coastal change to new development
 - as a result of the above, potential loss of regeneration opportunities as areas vulnerable to physical changes to the coast may suffer from lack of development needed for them to adapt, and/or become deprived (negative spillovers) when appropriate development should take place, and provision of land is not made for relocation of assets and infrastructure
 - development that does occur is not necessarily sustainable due to the predicted coastal change risk
 - pressure to increase investment in hard sea defences (at increased public sector cost) as an alternative to managing coastal change risk and
 - inappropriate development in areas vulnerable to coastal erosion will become uninsurable and difficult or impossible to sell due to lack of mortgage availability, resulting in potential blight
18. There is potentially an increase in **social** costs as a direct consequence of the costs highlighted above. Residents could find job opportunities restricted as regeneration opportunities can not go ahead and /or find themselves homeless and approach the local council for help.

19. No specific **environmental** cost has been identified for the 'Do Nothing' option.

Benefits

20. The **economic** benefits of the 'Do Nothing' option primarily centre on the savings of the costs and effort of producing and disseminating the new policy.
21. No specific **environmental** and **social** benefits have been identified for the 'Do Nothing' option.

Option 2: Breakdown of costs and benefits

Costs

22. The **administrative** costs of implementing the proposed new policy will primarily fall on LPAs, the Environment Agency and developers. However, the LPAs and the Environment Agency, when consulted on the new policy, welcomed the clarity and flexibility that the new policy framework will provide and did not make representations about cost. There is a general acceptance that the administrative burden will not be significantly increased by the new policy as LPAs are already faced (and will continue to be, regardless of whether the policy is implemented) with situations where coastal communities are impacted by coastal change and solutions are being sought.
23. There would be no additional costs for LPAs in relation to producing SMPs as these are already required. But there may be costs associated with the lack of technical ability within coastal LPAs to interpret the technical information on coastal erosion mechanisms; the assessment of risk and ways of managing it provided by SMPs and associated maps and data developed by the Environment Agency and local authorities; and to understand their significance in spatial terms.
24. There will be costs to developers in producing a vulnerability assessment for any development proposed within the CCMA that the policy requires LPAs to designate (essentially the area vulnerable to coastal erosion over the next 100 years). The level of detail required in the vulnerability assessment will depend on the type and scale of development proposed (most development is expected to be small scale) and the total cost of this requirement will depend on how many applications arise for coastal development. However, given the relatively small area of the country likely to be affected, and its generally sparsely developed nature, relatively few vulnerability assessments are likely to be required. Consultation responses on this have put the cost for a vulnerability assessment at between £5000 to £10000 for a large development but as low as £500 for a small temporary structure (expected to comprise the majority of applications). The costs for such assessments should be set against the benefits to the developers from the development going ahead.
25. Implementation of the proposal to allow time-limited development in areas vulnerable to coastal erosion could be costly for LPAs to administer. LPAs will be

required to manage compliance of the specific planning conditions attached to this type of development, which would require the removal of the proposed development before it became at imminent risk; and the restoration of the vacated site. However, the number of applications in CCMAAs is likely to be relatively small and LPAs would welcome the ability to be able to permit development that would be beneficial for coastal communities.

26. Facilitating the relocation of development through 'roll-back' policies could also be costly for LPAs to administer. Such policy will require LPAs to identify and safeguard in their local development documents (LDDs) appropriate land for relocating development affected by coastal erosion. Such development may include, for example, housing, community facilities, commercial and business uses that may be considered essential for the social and economic well-being of coastal communities. Also, there will be costs to the LPAs in providing the necessary advice and assistance to developers and individuals, assessing planning applications and dealing with complaints and problems associated with the relocation policy as it is implemented. In addition, there will be an 'opportunity cost' in providing alternative sites for relocation of development impacted by coastal change as land put aside for this purpose cannot then be used for other land use purposes. But the availability of such sites is important for maintaining the social and economic long-term sustainability of coastal areas.
27. The relocation of development threatened by coastal erosion will bring costs to both business and individuals resulting from rebuilding and replacing their properties and businesses. These will vary across different land uses, and be dependent on the pattern and timing of coastal erosion. But these are costs that will be incurred regardless of the proposed policy changes, as firms/individuals located in coastal sites impacted by erosion will have to move before their property becomes unsafe. The availability of land for relocation should facilitate this process and help reduce the costs to firms/individuals by planning the optimal scale/timing for relocation.
28. Defra's *Coastal Change Policy* consultation considers the support available to communities in adapting to coastal change. In particular, it has established a coastal change pathfinder programme to explore approaches which support communities in adapting to coastal change (see <http://www.defra.gov.uk/corporate/consult/coastal-change/index.htm> for further details).
29. There will be a resources implication to the Environment Agency in acting as a consultee and providing advice on planning applications, and for the LPA, and possibly developers, in liaising with the Agency over applications. The Environment Agency accepts these resource implications as part of its new coastal overview remit. But there will also be associated benefits resulting from better informed decisions, leading to more efficient allocation of developments.

30. No specific **environmental** and **social costs** have been identified for this option.

Benefits

31. One of the major benefits of the proposed new policy will be to reinforce the strategic approach to environmental risk management through the planning system already promoted through Planning Policy Statement 25 (PPS25) *Development and Flood Risk*. The new policy strengthens the message that coastal change risk should be considered as early as possible at all stages of the planning process. This will result in better management of the predicted impact of coastal change, with less reliance placed on the need for hard defences.
32. Working in partnership with other organisations should help to promote a common understanding of coastal processes and their impacts, identify key issues for coastal planning and help identify solutions for development and growth, regeneration, natural and historic conservation, and coastal protection and defence which better benefit coastal communities.
33. Under the 'do nothing' option it is unclear where development would be acceptable on the coast and this leads to planning applications coming forward in inappropriate locations. The introduction of coastal change management areas for undefended areas of the coast affected by coastal change will provide clarity and should lead to a reduction in speculative planning applications. This should lead to a reduced burden on local authorities who will no longer need to deal with inappropriate applications for planning permission and lead to benefits for developers in terms of saving the cost of making applications which would be unlikely to be granted.
34. Allowing time-limited developments which are crucial to the local economy and directly linked to the coastal strip, and facilitating the roll-back and planned relocation of development, will enhance coastal communities' resilience to coastal change. This approach will bring economic and social benefits to these communities by allowing development that is appropriate and safe.
35. Short-term costs to the development process are expected to be outweighed considerably by longer-term social, economic and environmental benefits. By mainstreaming consideration of coastal change risk within the planning process now, much time and resource will be saved in the future, making peoples' lives safer and minimising the adverse economic and social impacts by helping coastal communities adapt.
36. The policy, in promoting a more strategic and integrated approach towards coastal change risk management, will initiate a more coordinated approach to planning and investment on the coast. It should ensure that spatial policies to support the delivery of regeneration and economic growth for coastal areas take proper account of the

physical processes affecting the coast and decisions regarding the planning and management of coastal defences.

Specific impact list checklist

37. Alongside the main body of evidence for the costs and benefits of each of the options presented, some discussion is included of their impact on the following:

Competition assessment

38. The proposed new policy is not expected to have any major impact on businesses. There is no expected change to the structure of supply and demand, and hence no competition impacts.

Small firms impact test

39. The proposed new policy would affect all type of business depending on their location but irrespective of their size. Whilst the proposed regulatory process may potentially impact disproportionately on smaller businesses that do not benefit from economies of scale, so may the benefits of the policy for affected small firms who, due to the lack of such economies of scale, may face more limited location options and so will benefit proportionally more from effective coastal change management in planning policies.
40. Small businesses that need to locate on the coast for tourism reasons and benefit from those locations cannot expect to ignore the risk from coastal change. By undertaking a vulnerability assessment, they will be able to understand the risk to their proposed development and assess, at an early stage, the implications of applying time-limited permissions and explore opportunities for the roll-back or relocation to more sustainable locations before the risk from coastal change becomes imminent.

Legal aid

41. No legal aid impact identified.

Sustainable development

42. The principle of sustainable development underpins the policy proposal. Its emphasis is on ensuring that development on the coast remains safe during its expected lifetime, and enhancing the resilience of coastal communities to the increasing risk from coastal change. This approach will play an important part in minimising the effects of climate change and promoting the long-term viability of coastal communities in a sustainable way.

Carbon assessment

43. No specific carbon assessment effect identified.

Other environment

44. By ensuring that coastal change impacts are considered alongside wider social, economic and environmental spatial policy objectives, and are integrated effectively with other strategies and plans of significance to the coast, the proposed new policy would deliver wider environmental benefits.

Health impact assessment

45. The new policy should ensure that new developments and people are not placed at an unacceptable risk from coastal change, and deliver sustainable coastal communities that are resilient to the predicted coastal change. Bringing more certainty to coastal communities through positive planning for their future should reduce stress.

Race, gender, disability and other equality

46. The proposed new policy would impact equally across all members of the community, and there is no evidence to suggest that any particular racial or ethnic group has an increased exposure to coastal change risk.

Human rights

47. No specific human rights impacts identified.

Rural proofing

48. In spatial terms, rural areas are likely to be at a higher risk of coastal change than developed coastal areas, as the economic arguments for defending some smaller scattered rural communities may be weaker than those for the more developed coastal areas.
49. However, the proposed policy would provide a consistent approach towards managing the risk from coastal change to development, regardless of whether the affected areas are rural or urban.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	Results in Evidence Base?	Results annexed?
Competition Assessment	Yes	No
Small Firms Impact Test	Yes	No
Legal Aid	Yes	No
Sustainable Development	Yes	No
Carbon Assessment	Yes	No
Other Environment	Yes	No
Health Impact Assessment	Yes	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	Yes	No

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