

REGULATION 19

Response to Policy DS23 Flood Risk

Issues are:-

1. The policy encompasses much more than flood risk. It needs to be divided into 2 separate policies, one which relates to Flood Risk to encompass Clauses 1 through to 5 and then a second policy addressing Coastal Protection Zones which encompasses parts 6 to 8 (if relevant). I would not expect to find policies relating to Coastal Protection within a policy only titled Flood Risk. Alternatively, DS23 should be renamed as Flood Risk and Coastal Change but two separate policies is preferred.
2. Part 6 of DS23 is supported as aligning with the NPPF.
3. Part 8 is too vague in stating that a potential Coastal Change Management Area will be investigated and defined (if necessary) at Reculver because:-
 - a) No indication is provided either within the Plan or on the Policies Map of where such investigation and definition might take place;
 - b) Planning Practice Guidance states that “A Coastal Change Management Area will only need to be defined where rates of shoreline change are expected to be significant over the next 100 years” and “A Coastal Change Management Area should be defined where the shoreline management plan policy is anything other than hold or advance the line at any time during its plan period”. Evidence suggests that the cliffs to the north of Reculver Drive, Beltinge, Herne Bay, Kent, CT6 6QF are now stable following engineering work undertaken in the 1980’s and there is no need for the Council to continue with its presumption against appropriate infill development. Thus, there is no justification for including this part of the coast within a Coastal Change Management Area if that is potentially what is proposed;

and
 - c) No timeframe is provided for any such investigation. This means that land capable of development could be sterilised for unreasonable amounts of time whilst the Council decides whether designation of any part of the coast in the vicinity of Reculver as a Coastal Change Management Area is justified.

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