



Wealden Local Plan

Coastal Change Management Area (CCMA)

Background Paper – September 2026

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1. Introduction

1.1 Purpose of this Paper

This Background Paper has been prepared to inform the preparation of the Wealden Local Plan and to determine whether a Coastal Change Management Area (CCMA) and supportive policy should be identified within the district.

National planning policy requires local planning authorities to identify, as a Coastal Change Management Area, any area likely to be affected by physical changes to the coast where rates of shoreline change are significant over the next 100 years.

Shoreline Management Plans (SMPs) are the primary evidence source for understanding future coastal change and informing planning decisions, along with other evidence on coast change as outlined in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

The purpose of this paper is therefore to:

- Review the national policy requirements relating to coastal change;
- Examine the shoreline management policies affecting the Wealden coastline;
- Consider the evidence base in relation to coastal change;
- Consider the need for a CCMA designation.
- Provide evidence to support the Council's approach within the Local Plan.

1.2 Geographical Context

Wealden District contains approximately 10km of coastline located between east of Eastbourne and west of Rother District. There is further coastline west of Eastbourne Borough's boundary although part of this is within the planning control of the South Downs National Park Authority. The coastline comprises two distinct character areas:

- The chalk cliff coastline around Birling Gap and the Seven Sisters (which are under the planning control of the South Downs National Park Authority).
- The low-lying frontage at Pevensey Bay, where coastal defences protect the Pevensey Levels and adjacent communities from coastal flooding and erosion.

The area of consideration of the CCMA therefore only includes the Pevensey Bay coastal frontage, as it is the area in the planning control of Wealden District Council. This covers the area from the Eastbourne boundary through to the Rother District boundary at Normans Bay.

1.3 Justification for Considering a CCMA

Wealden District Council (WDC) did not present a CCMA policy as part of the earliest stages in the development of the Wealden Local Plan. As part of the Council's Regulation 18 Draft Local Plan consultation between 15 March and 10 May 2024 representations were received indicating this being an omission in the Local Plan. Therefore, the Council progressed work on compiling an evidence base on coastal change management. The Council also engaged with neighbouring planning authorities through strategic cross boundary meetings and other specific coastal planning focused meetings to understand the approaches other local authorities were taking and to ensure consistency especially in relation to the coastal boundary between Wealden and both Eastbourne Borough and Rother District.

Further to these meetings, WDC felt it was essential to engage directly with the Environment Agency (EA) in relation to their role in coastal protection, the Shoreline Management Plan (SMP) and the delivery of the Pevensey Bay to Eastbourne Coastal Management Scheme. WDC has had ongoing engagement and meetings with the EA throughout the remainder of the development of the Wealden Local Plan on this issue and other matters.

2. Policy Context

2.1 National Planning Policy Framework and Planning Practice Guidance

The NPPF (December 2024) requires local planning authorities to manage the impacts of climate change, flooding and coastal change through plan-making.

The NPPF states that local plans should identify CCMA's where land is likely to be affected by physical changes to the coast. SMPs provide the strategic evidence base for this process.

The PPG advises that CCMA's should be defined where rates of shoreline change are significant over the next 100 years, taking account of climate change.

Importantly, guidance indicates that CCMA's will generally not be required where the accepted SMP policy is to "Hold the Line" or "Advance the Line" throughout the plan period, provided there is appropriate evidence regarding the continued implementation of the management approach.

The evidence base on coastal change should relate to areas identified in the NPPF and PPG, including coastal erosion, coastal landslips or cliff instability, permeant coastal inundation and coastal accretion (build-up of sediment causing the coastline to move seaward).

2.2 Shoreline Management Plans

SMPs establish the strategic approach to managing flood and coastal erosion risk along the English coastline over a 100-year planning horizon. SMPs are approved by the Environment Agency and adopted by the relevant coastal authorities. They

inform both investment decisions and the planning system, including the identification of CCMA's.

3. Shoreline Management Evidence

3.1 A Description of the Coast

The shingle beach at Pevensey Bay was formed through long-term natural coastal processes. The primary source of the shingle was the erosion of the chalk cliffs at Beachy Head and Holywell, where flint nodules embedded in the chalk were released and shaped into shingle by wave action. These materials were transported eastward by longshore drift, gradually accumulating to form the extensive shingle barrier at Pevensey Bay. This barrier eventually enclosed the Pevensey Levels, creating a low-lying wetland environment behind the beach. Over time, reductions in natural cliff erosion and the effects of sea level rise have diminished the natural supply of shingle, leading to the need for active beach management to maintain coastal defences.

The construction of timber groynes along the Pevensey Bay frontage began in the early 20th century, with around 150 groynes installed to slow the natural eastward movement of shingle driven by longshore drift. These structures were designed to retain beach material and reduce erosion, but by the early 2000s many had deteriorated and were either removed or allowed to fail as part of a shift toward open beach management. Large-scale, managed beach recharge and shingle recycling began in 2000 under a 25-year Public-Private Partnership between the Environment Agency and Pevensey Coastal Defence Ltd. This marked the start of regular shingle importation from offshore sources and systematic redistribution along the frontage to maintain beach levels. While some beach management had occurred prior to this, the 2000 agreement formalised and scaled up intervention in response to reduced natural shingle supply and increased risk of coastal erosion leading to flood risk.

The stretch of coastline has therefore been shaped by a complex interplay of natural processes and human intervention as part of the process known as coastal change which can be described as physical changes to the shoreline for example; erosion, coastal landslip, permanent inundation and coastal accretion (UK Marine Policy Statement, MPS). The MPS is clear that coastal change is likely to be exacerbated by climate change, with implications for activities and development on the coast. These risks are a major consideration in ensuring that proposed new developments are resilient to climate change over their lifetime.

3.2 Relevant Shoreline Management Plans

Wealden's coastline falls within the South East Coastal Group area which is covered by shoreline management planning documents. The principal area of potential concern from a planning perspective is the Pevensey Bay frontage, which forms part of the [South Foreland to Beachy Head SMP \(SMP11\)](#). For planning policy purposes the SMP11 was adopted in 2006 and is a living plan, being refreshed through the

national SMP update programme in 2024. Policies within it extend for 100 years through to 2105 and the SMP may be refreshed in future years (as in 2024), although no timeframe for this is currently identified.

Section 1.1 of the South Foreland to Beachy Head 2006 SMP which covers Pevensy Bay is clear that a SMP "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". In other words, the SMP provides a framework for the management of coastal change.

The SMP is formally adopted by the Environment Agency and relevant local authorities. It is a non-statutory, high-level policy document that forms part of the Department for Environment, Food and Rural Affairs (Defra) strategy for flood and coastal defence, but it is limited to coastal defence management and does not set policy for wider land use planning.

SMPs are complementary with the National Flood and Coastal Erosion Risk Management Strategy for England¹ (NFCERMS) which sets out a comprehensive long-term vision and strategic framework for managing flood and coastal erosion risks across England. NFCERMS has a Vision "A nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100" and outlines long-term goals supported by evidence on future flood risks and investment requirements.

The SMP sets out the 'Hold the Line' policy for Pevensy across all three epochs (short, medium, and long term), meaning that the current position of the shoreline will be maintained using coastal defences. This strategic approach is intended to safeguard the Pevensy Bay frontage, which is low-lying and backs residential areas, key infrastructure, and internationally important habitats. The SMP acknowledges that rising sea levels may require increasingly robust defences in future, with potential implications for beach narrowing and property risk.

In October 2020, the [Shoreline Management Plans: Supplementary Guidance](#) was published by the EA to support the ongoing maintenance and delivery of SMPs. This guidance included a refresh of SMP policies using updated climate change data from 2018, but it did not alter the original 2006 policy position for Pevensy, which remains 'hold the line'.

3.3 Existing Coastal Defences

Pevensy Bay forms an important flood defence frontage protecting significant residential development, employment and commercial premises, infrastructure and the environmentally important Pevensy Levels. The Environment Agency is responsible overall for the strategic management of these coastal defences and the

¹ <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2>

frontage has benefited from reinforcement and ongoing management arrangements to maintain protection standards.

Coastal defence management for the Pevensey frontage transitioned in 2025 from a 25-year Public Private Partnership (PPP) with Pevensey Coastal Defence Ltd (PCDL) to the Environment Agency, marking the first time Pevensey and Eastbourne are being brought under a single, integrated coastal scheme. This change aligns with the strategic direction of the SMP and is part of the [Pevensey Bay to Eastbourne Coastal Management Scheme \(PevEb\)](#), which covers a 15km stretch from Holywell (Eastbourne) to Cooden Beach within Rother District. While the current short-term phase (2025–2027) focuses on the 8.5km Pevensey frontage, the medium-term phase (2027–2037) will see the full 15km frontage—including Eastbourne—managed together. The scheme aims to reduce flood and erosion risk to residential properties and critical infrastructure, with an initial focus on protecting 3,000 properties, rising to 18,000 once the full frontage is integrated.

Operational delivery is currently supported by VolkerStevin, appointed to carry out beach operations—including shingle movement, beach reshaping, and groyne maintenance—under a contract running until October 2027. In parallel, JBA Consulting is developing the Full Business Case (FBC) for Phase 1. While PevEb’s phases are tied to funding cycles, engineering delivery, and stakeholder engagement, the SMP uses broader planning epochs (0–20, 20–50, and 50–100 years) to guide long-term policy decisions such as “Hold the Line,” “Managed Realignment,” or “No Active Intervention”. This divergence in timelines reflects the need to coordinate practical delivery with evolving risk, funding certainty, and community priorities, rather than a misalignment in policy intent. The South Foreland to Beachy Head SMP action plan explicitly states that strategic management approaches should guide the PevEb Strategy and that any changes in management should be reflected within the SMP framework².

3.4 SMP Policy Assessment

The adopted SMP identifies management approaches for each policy unit over three epochs:

- 0-20 years;
- 20-50 years; and
- 50-100 years.

For the Pevensey Bay and Eastbourne frontage, the SMP establishes a long-term strategy based on maintaining coastal defences and continuing protection of the shoreline. The SMP specifically recognises the importance of ensuring the strategic management approach guides future defence investment and management arrangements.

² [South Foreland to Beachy Head SMP11 | Shoreline Management Plans](#)

The SMP does not identify a strategic policy of managed realignment, no active intervention or shoreline retreat for the Pevensy Bay frontage. Instead, the continued maintenance and management of defences is the basis of the adopted strategy.

Pevensy Bay is currently protected by a shingle beach defence system under a 'Hold the Line' policy set out in the SMP. However, PevEb has confirmed funding only until 2027, with potential funding streams identified but not yet confirmed from 2027-2037 and 2037 onwards. This is detailed within the 'Phased delivery' section of the EA's Position statement at Appendix A. Beyond this date, the future of coastal defence funding is not certain, and the risk of erosion and flooding increases significantly.

3.5 Engagement with the Environment Agency

WDC held a series of meetings with the Environment Agency in 2025 and 2026 to ensure that up to date information on funding was secured and to discuss the principles of moving forward with a CCMA policy for the Wealden Local Plan. This helped shape the Council's position and policy drafting for the development of the draft 'Focused' Local Plan (Regulation 18 stage) in early 2026. The EA was aware that the Council was proposing a draft policy on this issue and as such prepared a position statement (see Appendix A) to state their factual position in relation to the relationship with the PevEb scheme, information on the phased delivery of the scheme and the funding position. WDC explained the benefits to the EA of gaining public and stakeholder representations on the draft policy to develop the evidence base and gather both stakeholder and public opinion moving forward.

4. Justification for Consulting on a Draft CCMA Policy

In the lead up period to the production of the 'Focused' Local Plan (Regulation 18), WDC gathered a suite of evidence on Coastal Change Management. This involved looking at best practice examples from other local authorities as well as considering the most up to date evidence base. At this time, the Council considered the following important update to flood erosion mapping by the Environment Agency.

To help plan for the future of the Wealden coastline, it was essential to consider and use the most cautious and forward-looking data available. The publication of the updated National Coastal Erosion Risk Mapping (NCERM) dataset by the Environment Agency on 28 January 2025 provided the most up-to-date national picture of coastal erosion risk for England. This dataset incorporates over a decade of additional coastal monitoring data and reflects the latest shoreline management approaches. It also includes future scenarios accounting for climate change, such as sea level rise, based on UK Climate Projections (UKCP18). The mapping shows how the coast could change over the next 100 years if no new defences are built, nor existing ones maintained, and if sea levels rise significantly due to climate change. In Pevensy Bay, the updated mapping clearly identifies that residential properties may be at risk if existing coastal defences are not maintained, representing a material change in the evidence base.

This resulted in the Council mapping a proposed draft CCMA based on the following:

- A long-term view to the year 2105;
- A scenario where no new coastal protection is added; and
- A high-impact climate change forecast (the most extreme but possible case).

The Environment Agency's official climate change allowances guidance also recommends using the most extreme climate scenario (known as the "Upper End") for developments expected to last beyond the year 2100—such as homes and infrastructure. By following this guidance, the Council is making sure planning decisions are based on the best available science and are designed to protect people, property, and the environment in the long term.

The draft CCMA was mapped as a precautionary consultation scenario using the 2105 NCERM projection, the assumption that no new coastal protection would be provided or existing defences maintained, and the upper-end climate change allowance. This enabled the Council to test the implications of defence failure and seek views on whether those implications justified a formal designation, while recognising that the scenario did not represent the adopted SMP policy for Pevensy Bay. This includes Beachlands, because the Coast Road is affected in this area and would therefore cut access to certain areas.

The Local Plan draft policy (Appendix B) approach presented at the time of the Regulation 18 'Focused' Local Plan was followed by justification within the supporting text to the policy. This stated that the approach followed national

guidance and helped make sure the Local Plan policy is as strong as possible and future-proof. In the introduction to the policy the text explained the following:

“These proposals ensure the Local Plan reflects the most current and nationally recognised evidence on coastal erosion risk and acknowledges the risk of coastal erosion and flooding to residents, business and infrastructure within the Pevensy Bay area. The consultation provides an opportunity for stakeholders and the public to comment on whether the designation and policy are appropriate, and whether the evidence justifies this approach. It also helps raise awareness of the potential implications of coastal change in the affected areas.”

5. Comments received to the Focused Local Plan (Regulation 18) Consultation

Once the ‘Focused’ Local Plan consultation closed, the representations received to this part of the consultation were analysed, noting a number of concerns on the need for a CCMA based on the hold the line position of the SML. A total of 60 representations were received on the draft policy, and these were balanced in support of the principle of the policy and objection. Statutory consultees such as the EA and Natural England took a supportive but balanced approach in response to the policy at this stage, and in discussions subsequent to the consultation closing, stating that the evidence base compiled by WDC should be the focus and would support the policy direction moving forward. Objections primarily from local residents and Pevensy Parish Council noted that if the policy was to be progressed a greater area should be considered, that linkages should be made to the approach of neighbouring authorities, and that the policy was not required based on the hold the line position of the SML.

The representations that were received in relation to the proposed policy on the CCMA (Policy CC9 of the ‘Focused’ Local Plan) can be found within the supporting Consultation Statement to the Wealden Local Plan (Regulation 19 version). These provide a summary of the representations received from stakeholders and the general public, as well as the Council’s general response to the issues raised and any resulting actions.

6. Final Assessment of the Need for a Coastal Change Management Area

6.1 Methodology

The assessment of whether the Council should continue with a proposed CCMA policy, has involved considering the following:

- National planning policy;
- Planning Practice Guidance;
- Shoreline Management Plan evidence;
- Existing coastal defence infrastructure;
- The strategic approach to flood and coastal erosion risk management; and

Representations received on the Draft CCMA Policy within the Wealden 'Focused' draft Local Plan (Regulation 18) and the Council's position and response to these.

6.2 The Council's Position

The central question is not whether Pevensey Bay would face serious consequences if its defences failed, but whether significant shoreline change is expected under the accepted management strategy. The adopted SMP maintains a 'Hold the Line' policy across all three epochs, and the Environment Agency continues to operate and develop the PevEb scheme to implement that strategy. The following assessment therefore distinguishes the consequences of an unmitigated failure scenario from the likelihood of significant shoreline change under the established policy and management arrangements.

The Council has considered the proposed CCMA designation following the Regulation 18 'Focused' Local Plan consultation in February and March 2026. It has taken account of the consultation representations, the evidence assembled in this background paper, and subsequent engagement with the Environment Agency, Pevensey Parish Council and Natural England. That process has enabled the Council to test whether the acknowledged consequences of defence failure justify a CCMA when set against the accepted 'Hold the Line' policy, the existing defence infrastructure and the Environment Agency's continuing management arrangements.

The Council has held separate meetings with both the Environment Agency and Pevensey Parish Council, as well as a meeting with Natural England where the approach to the CCMA was discussed. The meetings took place as follows:

- WDC meeting with Pevensey Parish Council – 13 May 2026
- WDC meeting with Natural England – 18 June 2026
- WDC meeting with Environment Agency – 1 July 2026

The purpose of these meetings was to further present and discuss the evidence base and position in relation to the development of the CCMA policy. WDC took all the evidence and information that was shared away from these meetings, taking time to consider its position based on all the elements that are presented in section 6.1 above. It was only possible for the Council to come to a conclusion on its position

once it had considered all the representations received, had held meetings with all the organisations above, and had collated all relevant evidence base and presented it through this background paper.

6.3 Physical Coastal Change

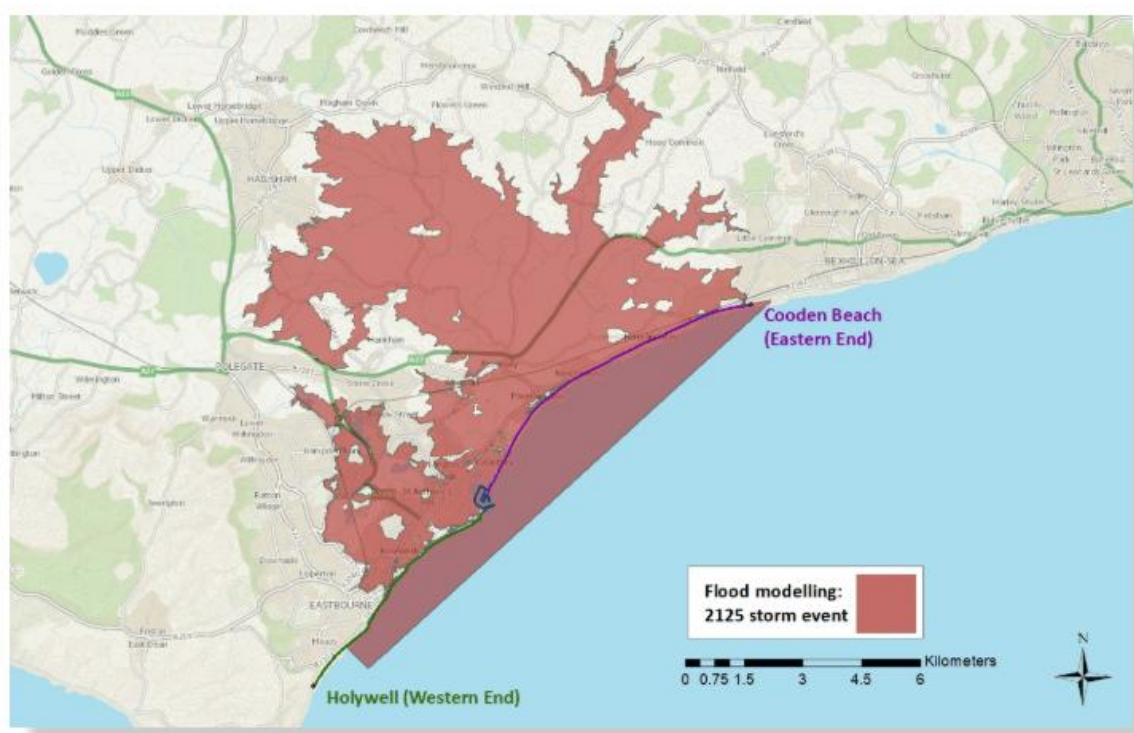
It is clear that coastal processes continue to operate across Wealden's coastline and that the Environment Agency is responsible for managing this change. The evidence within the South Foreland to Beachy Head SMP is clear on its commitment to coastal change management and that the associated PevEb Scheme helps to implement the delivery of managing that change. The intention and prioritisation for the EA to deliver the PevEb scheme indicates that there will not be any significant unmanaged shoreline retreat that would affect developed areas, infrastructure and environmentally sensitive areas currently protected by coastal defences along the Pevensey Bay frontage.

The 'Hold the Line' policy and delivery of the PevEb scheme mean that coastal flooding and erosion risks are actively managed through established defence infrastructure and the SMP strategy. Funding for all elements of the scheme is not formally confirmed for the entire Local Plan period to 2042 or beyond. Nevertheless, the evidence available to the Council comprises the continuing adopted SMP policy, the Environment Agency's current management of the frontage, ongoing operational delivery and the development of the PevEb scheme. These factors provide a reasonable evidential basis for concluding that defence management will continue to protect residential and commercial premises, transport and essential infrastructure as well as significant and sensitive environmental designated areas such as the Pevensey Levels Special Area of Conservation (SAC) and Ramsar site, while recognising that future funding decisions will require monitoring.

The extent of the area that could be affected by erosion and inundation if coastal flood defences were to be breached is significant, based on a 2125 'do nothing extent' flood model which is presented in the SMP and shown in Figure 1 below. The Environment Agency explains that:

- A breach anywhere along the 15 km frontage could flood a much wider inland area because of the low-lying topography behind the shingle barrier;
- The Pevensey Levels largely comprise a former estuary isolated from the sea by the shingle ridge, making the hinterland particularly vulnerable to tidal inundation if defences fail; and
- The wider PevEb scheme area contains more than 18,000 properties considered at risk from future coastal flooding.

Figure 1. Shoreline Management Plan 2125 Do Nothing Flooding Extent Map



Animation showing modelled storm flood water extents without scheme interventions

This map shows that inundation is a significant issue for the Wealden coastal area and is much more significant than erosion rates. The 2125 'do nothing' flood model demonstrates that the consequences of defence failure would be extensive, with inundation presenting a substantially greater risk than shoreline erosion. However, the model represents a counterfactual scenario in which coastal defences are not maintained; it does not describe the expected outcome under the adopted 'Hold the Line' policy. Its relevance to the CCMA assessment is therefore to demonstrate why continued defence management remains a strategic priority, rather than to establish that significant shoreline change is expected under current policy.

6.4 Significance Test

The PPG advises that a CCMA is only required where significant rates of shoreline change are anticipated over the next 100 years. A CCMA will not normally be necessary where the accepted SMP policy is to hold or advance the line throughout that period, subject to evidence about how the policy may be secured and advice from the Environment Agency. The Council has therefore considered future funding uncertainty as a relevant risk, but not as conclusive evidence that significant shoreline change is anticipated.

In assessing the significance of the issue, the evidence review demonstrates that:

- The published SMP identifies a continued defence-based management strategy that is prioritised for delivery throughout the Wealden Local Plan

period and beyond. The potentially severe consequences of a breach, including widespread inundation of property, infrastructure and designated environmental areas, reinforce the strategic importance and priority of maintaining the PevEb frontage;

- Existing coastal defence infrastructure is in place and actively managed by the Environment Agency. Current operations and the development of the PevEb scheme demonstrate a continuing commitment to implementing the 'Hold the Line' strategy. Funding beyond the confirmed programme remains subject to future business cases and funding decisions, and the position should therefore be monitored as further information becomes available;
- There is no adopted SMP policy promoting large-scale retreat or managed realignment affecting developed areas within Wealden district. In addition, the coastal defence strategy and measures will take account of future climate change scenarios.
- It is not expected that there will be significant coastal change requiring other spatial planning policy controls and as such a CCMA approach is not anticipated.

Accordingly, the Council considers that the evidence does not meet the national policy test for designating aCCMA. The accepted SMP policy is to 'Hold the Line' throughout the 100-year period; coastal defences are in place and actively managed; and the PevEb scheme is intended to continue implementing that strategy. Although the timing and source of future funding cannot be guaranteed across the full period, that uncertainty does not, on the evidence currently available, establish that significant shoreline change is anticipated. The Council therefore does not propose to carry forward the CCMA designation.

7. Conclusion

National planning policy requires CCMAS to be identified where land is likely to be affected by significant physical coastal change.

Having reviewed the NPPF, PPG, SMP evidence, representations on the Wealden Local Plan, and the strategic management arrangements for the Wealden coastline, the Council concludes that a CCMA designation is not required.

The adopted SMP establishes a long-term approach based on maintaining coastal defences at Pevensey Bay and protecting vulnerable communities and infrastructure supported by existing defence assets, current Environment Agency management and the development of the PevEb scheme. Existing defence assets are managed through ongoing coastal risk management programmes led by the Environment Agency and its partners. Whilst there is funding prioritised within the Wealden Local Plan timeframe, there is less certainty towards the end of the planning period (2042) and beyond. However, the evidence does not currently indicate that the accepted strategy will change or that significant shoreline retreat is anticipated. The severe consequences of defence failure strengthen the strategic case for continued management, but they do not themselves establish the national policy basis for a CCMA. On balance, an additional layer of policy control is therefore not justified at this stage.

The Council will monitor any material change to the SMP policy, the Environment Agency's delivery strategy, the condition and management of coastal defences, and the availability of funding across the Local Plan period. If updated evidence indicates that the 'Hold the Line' strategy is no longer expected to be delivered, or that significant shoreline change is anticipated, the need for a CCMA will be reconsidered through a future Local Plan review.

Therefore, Wealden District Council does not propose to designate a Coastal Change Management Area in the Wealden Proposed Submission Local Plan.

Appendix A – Environment Agency Position Statement



Position Statement: Coastal Change Management Area (CCMA) at Pevensy Bay – Draft Consultation Response

Environment Agency Response

Purpose and Context

This statement provides evidence and insight to assist Wealden District Council (WDC) in considering whether to designate a Coastal Change Management Area (CCMA) at Pevensy Bay. A CCMA is a planning tool used where future shoreline management may be uncertain. Our role is to assist informed decision-making by outlining current and future coastal management plans for the Pevensy Bay to Eastbourne Coastal Management Scheme (PevEb).

Roles and Responsibilities

- **Local Authority:** WDC is responsible for deciding if a CCMA is required and defining its policy and scope in line with national planning policy and local priorities.
- **Environment Agency:** We provide evidence-based information, including Shoreline Management Plan (SMP) policies, scheme progress, and funding confidence. By sharing reliable data, we help ensure decisions reflect both strategic objectives and practical delivery considerations.

Current and Future Coastal Management Plans

Pevensy Bay is part of a nationally significant coastal frontage, within the Environment Agency, protecting thousands of properties, critical infrastructure, and internationally designated habitats. The SMP policy for this area is Hold the Line, which underpins long-term coastal resilience planning.

PevEb is delivering this policy through proven engineering solutions and strong government support. While plans for current and future phases are in place, securing funding remains a critical step. Confidence in future investment is high, as demonstrated by recent national recognition, including a visit from the Secretary of State in October 2025.

Phased Delivery

- **Interim Phase (2025–2027):** £10 million investment in beach management between Sovereign Harbour and Cooden Beach to maintain flood protection for ~3,000 properties.
- **Phase 1 (2027–2037):** £116 million investment to protect ~6,000 homes, businesses, transport links, and habitats between Holywell in Eastbourne to Cooden Beach. This will be achieved through enhanced beach design and strengthened groynes.
- **Phase 2 (2037 onwards):** Major coastal defence interventions are anticipated. The approach will be guided by SMP policies.

Funding and Design Progress

Funding for coastal defence work covering the period 2027–2037 will be secured in early 2027 through the Environment Agency's established assurance process, which fully aligns with government standards for financial governance and long-term investment planning.



Detailed design for Phase 1 is already well underway, focusing on improvements to beach management and upgrades to key groynes. In addition, work has begun to develop an early business case for Phase 2, scheduled to start in 2037 after completion of Phase 1. As funding is not yet confirmed for delivery of works beyond 2027, the Council is consulting on whether a CCMA is needed as a precautionary approach.

Residual Risk

While the SMP policy is to *Hold the Line* and funding confidence is high, absolute protection cannot be guaranteed. Residual risk remains due to extreme weather, overtopping, and climate uncertainty. This risk is managed through regular monitoring, maintenance, and contingency planning.

Commitments

The Environment Agency will:

- Continue to provide updated evidence and technical advice.
- Engage with WDC and stakeholders throughout the CCMA consideration process.
- Support integrated planning for long-term coastal resilience.

Closing Statement

The Environment Agency's role in this consultation is to provide clear evidence and insight into current and future coastal management plans. The decision on CCMA designation rests solely with the local authority.

Appendix B – Wealden Focused Draft Local Plan CCMA Policy, March 2026

Coastal Change Management

Coastal change management is an important planning policy consideration for the district as it helps to protect communities, infrastructure and ecosystems from the adverse effects of coastal erosion and climate change. The NPPF and supporting Planning Practice Guidance (PPG) advocates the local designation of Coastal Change Management Areas (CCMAs) in order to identify areas in the UK's coastal regions that are likely to experience significant changes to the shoreline over the next 100 years. It is important that such areas are identified in Local Plans to: help inform planning and development management decisions; protect key infrastructure and high-quality agricultural land; and balance the need for development with the risks associated with coastal erosion and flooding.

Why are we consulting on this Policy and Spatial Designation?

Since the publication and consultation of the Regulation 18 Local Plan in March 2024, two significant developments have occurred, which provide new and clearer evidence regarding coastal erosion risk in the district:

1. The publication of the updated National Coastal Erosion Risk Mapping³ (NCERM) dataset by the Environment Agency on 28 January 2025 provides the most up-to-date national picture of coastal erosion risk for England. This dataset incorporates over a decade of additional coastal monitoring data and reflects the latest shoreline management approaches. It also includes future scenarios accounting for climate change, such as sea level rise, based on UK Climate Projections (UKCP18). In Pevensey Bay, the updated mapping now clearly identifies that residential properties may be at risk if existing coastal defences are not maintained, representing a material change in the evidence base.
2. The establishment of the Pevensey Bay to Eastbourne Coastal Management Scheme (PevEb) has replaced the former Pevensey Coastal Defence Ltd (PCDL) arrangement. The PevEb scheme covers a broader area and reflects a more integrated and strategic approach to long-term coastal management, encompassing both Eastbourne and Pevensey Bay.

Therefore, the Council is now proposing a Policy for Coastal Change Management (CC9) and the associated spatial designation of a Coastal Change Management Area (CCMA) as part of this consultation stage. These proposals ensure the Local Plan reflects the most current and nationally recognised evidence on coastal erosion risk and acknowledges the risk of coastal erosion and flooding to residents, business and infrastructure within the Pevensey Bay area. The consultation provides an opportunity for stakeholders and the public to comment

³ [National Coastal Erosion Risk Mapping \(NCERM\) - National \(2024\) - data.gov.uk](https://data.gov.uk/dataset/national-coastal-erosion-risk-mapping-ncerm)

on whether the designation and policy are appropriate, and whether the evidence justifies this approach. It also helps raise awareness of the potential implications of coastal change in the affected areas.

Wealden District has two areas of coastline either side of Eastbourne District – Pevensey Bay beach and the Cuckmere Haven. The Environment Agency is responsible for the provision and maintenance of the sea defences there. For plan making purposes the South Downs National Park Authority (SDNPA) has responsibility for the Cuckmere area. Wealden District Council is the planning authority for the area of coast to the east of Eastbourne up to the boundary with Rother District Council at Normans Bay.

The shingle beach at Pevensey Bay was formed through long-term natural coastal processes. The primary source of the shingle was the erosion of the chalk cliffs at Beachy Head and Holywell. These materials were transported eastward by longshore drift, gradually accumulating to form the extensive shingle barrier at Pevensey Bay. This barrier eventually enclosed the Pevensey Levels, creating a low-lying wetland environment behind the beach. Over time, reductions in natural cliff erosion and the effects of sea level rise have diminished the natural supply of shingle, leading to the need for 'active beach management' to maintain coastal defences.

The construction of timber groynes along the Pevensey Bay frontage began in the early 20th century, with around 150 groynes installed to slow the natural eastward movement of shingle driven by longshore drift. These structures were designed to retain beach material and reduce erosion, but by the year 2000, many had deteriorated and were either removed or allowed to fail as part of a shift toward 'open beach management'. Large-scale, managed beach recharge and shingle recycling began in 2000 under a 25-year Public-Private Partnership between the Environment Agency and Pevensey Coastal Defence Ltd. This marked the start of regular shingle importation from offshore sources and systematic redistribution along the frontage to maintain beach levels. The 2000 agreement formalised and scaled up intervention in response to reduced natural shingle supply and increased risk of coastal erosion leading to flood risk.

The stretch of coastline has therefore been shaped by a complex interplay of natural processes and human intervention as part of the process known as coastal change. This can be described as physical changes to the shoreline for example: erosion, coastal landslip, permanent inundation and coastal accretion as identified in the UK Marine Policy Statement (MPS). The MPS is clear that coastal change is likely to be exacerbated by climate change, with notable implications for activities and development on the coast. These risks are a major consideration in ensuring that proposed new developments are resilient to climate change over their lifetime.

Section 1.1 of the South Foreland to Beachy Head Shoreline Management Plan 2006⁴ (SMP) which covers Pevensey Bay is clear that a SMP "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". In simple terms, the SMP provides an important framework for the management of coastal change.

The SMP has been formally adopted by the Environment Agency and relevant local authorities. It is a non-statutory, high-level policy document that forms part of the Department for Environment, Food and Rural Affairs (Defra) strategy for flood and coastal defence, but it is limited to coastal defence management and does not set policy for wider land use planning.

SMPs are complementary with the National Flood and Coastal Erosion Risk Management Strategy for England⁵ (NFCERMS) which sets out a comprehensive long-term vision and strategic framework for managing flood and coastal erosion risks across England. NFCERMS has a clear vision, "A nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100" and outlines long-term goals supported by evidence on future flood risks and investment requirements.

The SMP sets out a 'Hold the Line' policy for Pevensey across all three timeframes (short, medium, and long term), meaning that the current position of the shoreline will be maintained using coastal defences. This strategic approach is intended to safeguard the Pevensey Bay frontage, which is low-lying and backs residential areas, key infrastructure, and internationally important habitats. The SMP acknowledges that rising sea levels may require increasingly robust defences in future, with potential implications for beach narrowing and property risk.

In October 2020, the Shoreline Management Plans: Supplementary Guidance⁶ was published to support the ongoing maintenance and delivery of SMPs. This guidance included a refresh of SMP policies, using updated climate change data from 2018, but it did not alter the original 2006 policy position for Pevensey, which remains 'hold the line'.

Coastal defence management for the Pevensey frontage transitioned in 2025 from a 25-year Public Private Partnership (PPP) with Pevensey Coastal Defence Ltd (PCDL) to the Environment Agency, marking the first time Pevensey and Eastbourne are being brought under a single, integrated coastal scheme. This change aligns with the strategic direction of the Shoreline Management Plan (SMP) and is part of the

⁴ [South Foreland to Beachy Head SMP11 | Shoreline Management Plans](#)

⁵ [National Flood and Coastal Erosion Risk Management Strategy for England, June 2022](#)

⁶ [Shoreline Management Plans – Supplementary guidance for their ongoing maintenance and delivery, Environment Agency, October 2020](#)

Pevensey Bay to Eastbourne Coastal Management Scheme (PevEb), which covers a 15km stretch from Holywell (Eastbourne) to Cooden Beach.

Figure X. 15km stretch of coastline between Holywell in Eastbourne and Cooden Beach in Pevensey covered by the PevEb scheme⁷



While the current short-term phase (2025–2027) focuses on the 8.5km frontage from Cooden beach to Sovereign Harbour, the medium-term phase (2027–2037) will see the full 15km frontage—including Eastbourne—managed together. The scheme aims to reduce flood and erosion risk to residential properties and critical infrastructure, with an initial focus on protecting 3,000 properties, rising to 18,000 once the full frontage is integrated.

Operational delivery is currently supported by VolkerStevin, appointed to carry out beach operations, including shingle movement, beach reshaping, and groyne maintenance, under a contract running until October 2027. In parallel, JBA Consulting is developing the Full Business Case for Phase 1. While PevEb’s phases are tied to funding cycles, engineering delivery, and stakeholder engagement, the SMP uses broader planning timeframes (0–20, 20–50, and 50–100 years) to guide long-term policy decisions such as “Hold the Line,” “Managed Realignment,” or “No Active Intervention.” This divergence in timelines reflects the need to coordinate practical delivery with evolving risk, funding certainty, and community priorities, rather than a misalignment in policy intent. The SMP action plan explicitly states that

⁷ [Pevensey Bay to Eastbourne Coastal Management Scheme](#)

strategic management approaches should guide the PevEb Strategy and that any changes in management should be reflected within the SMP framework⁸.

The PPG prescribes that a CCMA will only need to be defined where rates of shoreline change are expected to be significant over the next 100 years, taking account of climate change⁹. They will not normally need to be defined where the accepted SMP policy is to hold or advance the line (maintain existing or build new flood and coastal erosion risk management infrastructure) for the whole period covered by the SMP, subject to evidence of how this may be secured, taking advice from the Environment Agency. In accordance with this PPG Wealden District Council engaged with the Environment Agency regarding PevEb funding which is intended to deliver the strategic management approach of 'Hold the Line' as set out in the SMP. However, the Environment Agency is unable to confirm at this stage how the PevEb Strategy will be funded or delivered beyond 2027, therefore there is some uncertainty over its protection over the longer term.

The NPPF supports CCMA designation to promote sustainable development. Paragraph 7 of the NPPF outlines the planning system's role in balancing economic, social, and environmental objectives. Paragraphs 183–186 of the NPPF require plans to consider marine policy, identify CCMA's, and manage development in vulnerable coastal areas, including relocation and temporary permissions to reduce future risk.

The SMP applies a 'Hold the Line' policy to Pevensey Bay but acknowledges that new defences may be needed and adaptation may be required. Erosion projections are indicative and do not show precise future shoreline positions, therefore reinforcing the need for local planning controls.

The NFCERMS (2020) promotes adaptive planning, relocation of vulnerable development, and integration with marine planning. It supports CCMA's and SMP's as tools for managing long-term risk and enabling sustainable coastal resilience.

On this basis, and in line with national guidance, the Council considers it necessary to designate a CCMA and associated planning policy for areas of Pevensey Bay where long-term coastal erosion risk cannot be mitigated with certainty. The PPG also advises that residential development should assume a 100-year lifetime, and non-residential development a 75-year lifetime, reinforcing the need for long-term planning policy controls.

⁸ [South Foreland to Beachy Head SMP11 | Shoreline Management Plans](#)

⁹ [Flood Risk and Coastal Change: Paragraph 072 Reference ID: 7-072-20220825](#)

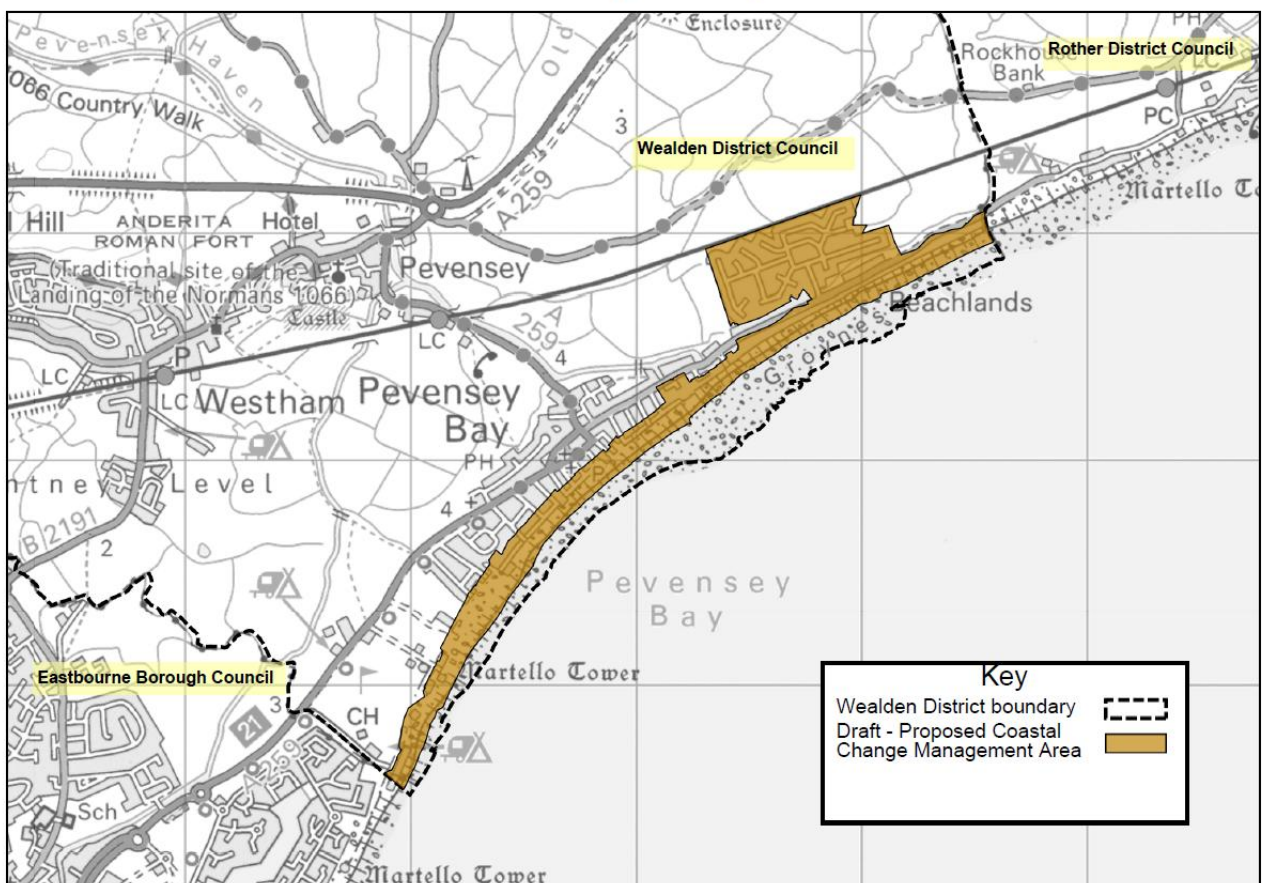
Policy CC9 Coastal Change Management Area (CCMA)

1. New permanent residential development, including proposals involving change of use, will not be supported within the Pevensy Bay CCMA (identified at Figure X).
2. Any other forms of development including infrastructure provision within the CCMA will only be considered acceptable where a Coastal Change Vulnerability Assessment—proportionate to the scale and type of development—demonstrates that:
 - (a) it is necessary in that specific location;
 - (b) it will be safe over its planned lifetime;
 - (c) it will not have an unacceptable impact on coastal change, including the character of the coast and any relevant designations; and
 - (d) it delivers wider sustainability benefits.
3. Development permitted under the above criteria may be subject to temporary planning permission and restoration conditions to ensure compatibility with long-term coastal change.
4. Adaptation of existing buildings, infrastructure or land uses within the CCMA will be supported where it reduces vulnerability and/or increases resilience, subject to compliance with other policies.
5. Proposals must safeguard and, where possible, enhance the King Charles III England Coast Path and public access to the shoreline, in accordance with the Marine and Coastal Access Act 2009.
6. Proposals for coastal change measures, including the decommissioning, or relocation of existing development and infrastructure will be supported where it is demonstrated to be unsustainable and at risk of loss within the next 20 years (short term). Such proposals must:
 - (a) Align with the Shoreline Management Plan (SMP) and the National Flood and Coastal Erosion Risk Management Strategy for England;
 - (b) Include a clear plan for restoration of the site to a natural or semi-natural condition, including the removal of built structures, materials, and services; and
 - (c) Demonstrate how the relocation will be to a sustainable location outside the CCMA, and how the vacated site will contribute to coastal resilience, biodiversity, or marine conservation objectives, particularly in relation to the Beachy Head East Marine Conservation Zone (MCZ), which extends from the shoreline offshore.
7. Where development or land management activities are permitted within the Coastal Change Management Area (identified at Figure Y) under the criteria

set out in Part 2 of this policy, they must demonstrate no adverse impact on the Beachy Head East Marine Conservation Zone (MCZ), including:

- (a) avoiding increased sedimentation, pollution, or disturbance to intertidal and subtidal habitats;
- (b) supporting nature-based solutions such as saltmarsh restoration or shingle ridge enhancement; and
- (c) maintaining vegetated buffers and sustainable drainage systems to reduce runoff.

Figure Y. Proposed Draft Coastal Change Management Area



Supporting Text

The proposed CCMA (provided in Figure Y) includes approximately 814 dwellings along Coast Road and within the Beachlands development (because the coastal erosion would cut access from these properties) as well as the Environment Agency Depot, Pevensey Bay Sailing Club and two cafes.

To help plan for the future of our coastline, the most cautious and forward-looking data available has been used. This data comes from the Environment Agency's

National Coastal Erosion Risk Mapping¹⁰ (NCERM), which shows how the coast could change over the next 100 years if no new defences are built, nor existing ones maintained, and if sea levels rise significantly due to climate change.

The map is based on:

- A long-term view to the year 2105;
- A scenario where no new coastal protection is added; and
- A high-impact climate change forecast (the most extreme but possible case).

This approach follows national guidance and helps make sure the Local Plan policy is strong and future-proof.

The Environment Agency's official climate change allowances guidance¹¹ also recommends using the most extreme climate scenario (known as the "Upper End") for developments expected to last beyond the year 2100—such as homes and infrastructure. By following this guidance, the Council are making sure planning decisions are based on the best available science and are designed to protect people, property, and the environment in the long term.

The CCMA was drawn to include all properties that would encounter issues should the coastline be in the position shown on the NCERM mapping for 2105 where there is no shoreline management plan policy (maintain the line for Pevensey Bay) and the higher climate change allowance. This includes Beechlands, because the Coast Road is affected in this area and would therefore cut access to certain areas.

The PPG on Flood Risk and Coastal Change clarifies that "Where the Shoreline Management Plan policy is to 'hold the line' but funding is not in place to maintain defences for the lifetime of the development, the local planning authority should designate a Coastal Change Management Area and apply appropriate planning policies".

Pevensey Bay is currently protected by a shingle beach defence system under a 'Hold the Line' policy set out in the SMP. However, the PevEb has confirmed that funding is currently only confirmed until 2027. Therefore, beyond this date the future of coastal defence is currently uncertain, and the risk of erosion and flooding increases significantly. The designation of areas within Pevensey Bay as a CCMA ensures that development decisions are made with full awareness of long-term coastal risks and supports the strategic objectives of the SMP, while ensuring compliance with national planning policy and guidance.

The restriction on new residential, commercial, or infrastructure development within the CCMA reflects the NPPF's requirement to avoid inappropriate development in vulnerable coastal areas and to reduce risk from coastal change (paragraph 184).

¹⁰ [National Coastal Erosion Risk Mapping \(NCERM\) – National \(2024\)](#)

¹¹ <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The PPG reinforces this by advising that development in CCMA's should be limited and justified through robust evidence, such as a Coastal Change Vulnerability Assessment as detailed in the policy.

The use of temporary permissions and restoration conditions is explicitly supported by NPPF (2024) at paragraph 186, which states that such measures may be necessary to reduce future risk to people and development in CCMA's. The PPG also advises that temporary development may be appropriate where it can be safely removed or relocated.

The Coast Road forms part of the promoted King Charles III England Coast Path (KCIECP), a national trail aiming to create a continuous walking route around the entire English coastline. Natural England formally approved and opened the section from Bay View Caravan Park to Herbrand Walk, Cooden on 6 April 2022. This policy safeguards the KCIECP in accordance with paragraph 185(d) of the NPPF, which requires that development within CCMA's must not hinder the creation or maintenance of a continuous signed and managed coastal route. This is further supported by the Marine and Coastal Access Act 2009, which underpins the national coastal access programme.

The overall support for coastal change and restoration align with the NFCERMS, which promotes adaptive approaches and relocation of vulnerable infrastructure to build long-term resilience. The SMP acknowledges that while the current policy is to 'Hold the Line', new defences may be required in the long term, and adaptation to coastal change may be needed. This policy ensures that any coastal change is accompanied by site restoration, which is consistent with paragraph 186 of the NPPF.

The policy supports adaptation of existing buildings and land uses to reduce vulnerability, in line with PPG guidance on resilience measures and retrofitting in areas subject to coastal change. This approach is also supported by the NFCERMS, which encourages local adaptation planning and community-led resilience.

The Beachy Head East Marine Conservation Zone (MCZ), which extends from the shoreline offshore, is protected under the Marine and Coastal Access Act 2009 and is referenced in paragraph 185 of the NPPF. Development within the CCMA must demonstrate there will be no adverse impact on intertidal and subtidal habitats. This aligns with the MPS, the South East Marine Plan, and the PPG, which require integration of marine and terrestrial planning to safeguard marine biodiversity.

Pevensey Bay is considered to be within a short-term risk area for coastal change, as defined in the PPG, due to the Environment Agency only confirming funding for coastal defences for the next two years at present. In such areas, only limited development directly linked to the coastal strip is appropriate, and permanent new residential development (including through change of use) is not considered suitable. The PPG does not restrict this to new dwellings, meaning that permitted development rights allowing extensions or ancillary buildings could result in

inappropriate development that increases the scale of property or the number or vulnerability of occupants at risk from coastal change.

The PPG advises that where permitted development is likely to have such effects, local planning authorities may consider using Article 4 directions to require planning permission to be sought in each case. In line with the PPG, we are actively considering the use of an Article 4 direction within the CCMA to remove permitted development rights and prevent vulnerable development. This approach is consistent with paragraph 54(c) of the NPPF, which requires that such directions be based on robust evidence and apply to the smallest geographical area necessary. This approach ensures that development within the CCMA is appropriately managed and aligned with national policy on climate resilience and coastal adaptation.

In addition, the Council are proposing the removal of the existing development boundary at Pevensey Bay. This is necessary to ensure that planning policy does not encourage windfall development in an area where long-term coastal defences cannot be guaranteed. National guidance requires Local Plans to steer development away from locations at risk of flooding or coastal change and to apply restrictive policies where future protection is uncertain. It also advises that new permanent residential development should not be supported in vulnerable coastal areas. By removing the development boundary, the Local Plan makes it clear that Pevensey Bay is not a suitable location for new permanent development, reflecting the best available evidence and supporting a precautionary, risk-based approach to plan-making.

The CCMA boundary and policy will be reviewed periodically in line with updated Strategic Flood Risk Assessment (SFRA), Shoreline Management Plan (SMP), and marine plan evidence, consistent with paragraphs 25 and 34 of the NPPF and the NFCERMS roadmap for adaptive planning. This process will include engagement with affected neighbouring authorities, including Eastbourne Borough Council and Rother District Council, to support coordinated and cross-boundary coastal resilience planning, as encouraged by national policy and Environment Agency guidance.

Consultation Questions

1. Do you support the designation of the CCMA at Pevensey Bay and do you have any comments on its boundary?
2. Do you have any other comments on the wording of the draft policy?
3. Should the Council consider this policy now and include it within the Wealden Local Plan, or consider it as part of a future review of the Local Plan when future funding for the Shoreline Management Plan may provide more certainty on the protection of the coast?
4. Should an Article 4 Direction be applied to remove permitted development rights for residential and commercial properties within the CCMA? This would include extensions, outbuildings, hard surfacing, and other forms of

development that could increase vulnerability or hinder managed retreat.

- 5.** Do you support the removal of the development boundary for Pevensey Bay to ensure that new windfall development is steered away from this location, which is at risk from coastal change?