

# Purbeck Local Plan

Submission January 2019

Coastal Change Management  
Areas evidence paper



Thriving communities in balance  
with the natural environment



## Executive summary

This paper summarises the evidence which supports planning Policy E6 in the Purbeck Local Plan. It explains how coastal change management areas (CCMAs) were identified in Purbeck and how the Council has interpreted national planning policy and guidance.

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### Introduction

1. Paragraphs 167-169 of the National Planning Policy Framework (NPPF) invites those councils in coastal areas to identify any areas which are likely to be affected by physical changes to the coast as coastal change management areas (CCMAs). The glossary of the NPPF defines a CCMA as:  

‘An area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.’
2. The South Devon & Dorset Shoreline Management Plan (SMP) Review (2011)<sup>1</sup> and the Poole and Christchurch Bays SMP Review (2011)<sup>2</sup> identify the sections of the District’s coastline which are likely to be affected by coastal change. The Council has used the evidence presented in SMPs to identify CCMAs.
3. The NPPF also states that Councils should:
  - be clear as to what development will be appropriate in such areas and in what circumstances; and
  - make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas. (Paragraph 167)
4. This evidence paper outlines the Council’s approach to identifying CCMAs and considerations that were taken into account when preparing ‘Policy E6: Coastal change management areas’ in the Purbeck Local Plan.

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<sup>1</sup> <http://www.sdadcag.org.uk/docs/html/frameset.htm>

<sup>2</sup> <http://www.twobays.net/smp2.htm>

## Defining CCMA's

### Method

5. Planning Practice Guidance (NPPG)<sup>3</sup> provides details about how councils should approach defining CCMA's. The guidance says that councils should demonstrate they have considered SMP's, which should provide the primary source of evidence.

### SMP's and coastal change

6. The South Devon & Dorset and the Poole and Christchurch Bays SMP's<sup>4</sup> show erosion lines and indicative erosion/ accretion zones over three time horizons. Taking account of environmental impacts, land use and population / human health, the SMP's make policy recommendations for future management of the coastline. These policy recommendations include:
  - Hold the line: Maintain or change the level of protection provided by defences in their present location.
  - Advance the line: Build new defences on the seaward side of the existing defence line to reclaim land.
  - Managed realignment: Allowing the shoreline position to move backwards (or forwards) with management to control or limit movement.
  - No active intervention: A decision not to invest in providing or maintaining defences.
7. NPPG states that CCMA's should only be defined where rates of shoreline change are significant over the next 100 years, taking account of climate change. They will not need to be defined where the accepted shoreline management plan (SMP) policy is to hold the line (maintain existing defences) or advance the line (build new defences)<sup>5</sup> for the whole period covered by the plan, provided there is evidence of how this may be secured.
8. The erosion lines, and erosion and accretion zones, in the SMP's are influenced by geology, drainage, historical recession and stability. Owing to this range of factors and the timelines, the lines / zones do not provide absolute certainty, but are currently the best indicators of coastal change in the short, medium and long term.

### Sections of the coastline where SMP's do not identify erosion / accretion zones

9. The Poole and Christchurch Bays SMP sub-divides the sections of coastline between Hurst Spit and Durlston Bay into different management units. This SMP includes Poole Harbour. Brownsea Island straddles Management Units PHB 2 and 3. There is a lagoon on the eastern side of the island, and low lying land around the lagoons edges. The SMP notes that this land falls within in

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<sup>3</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

<sup>4</sup> See [http://www.sdadcag.org/docs/SMP/Policy\\_Statements/01.pdf](http://www.sdadcag.org/docs/SMP/Policy_Statements/01.pdf) and [http://www.twobays.net/SMP2%20Final/Appendices/C3\\_EROSION\\_MAPPING\\_reformatted.pdf](http://www.twobays.net/SMP2%20Final/Appendices/C3_EROSION_MAPPING_reformatted.pdf)

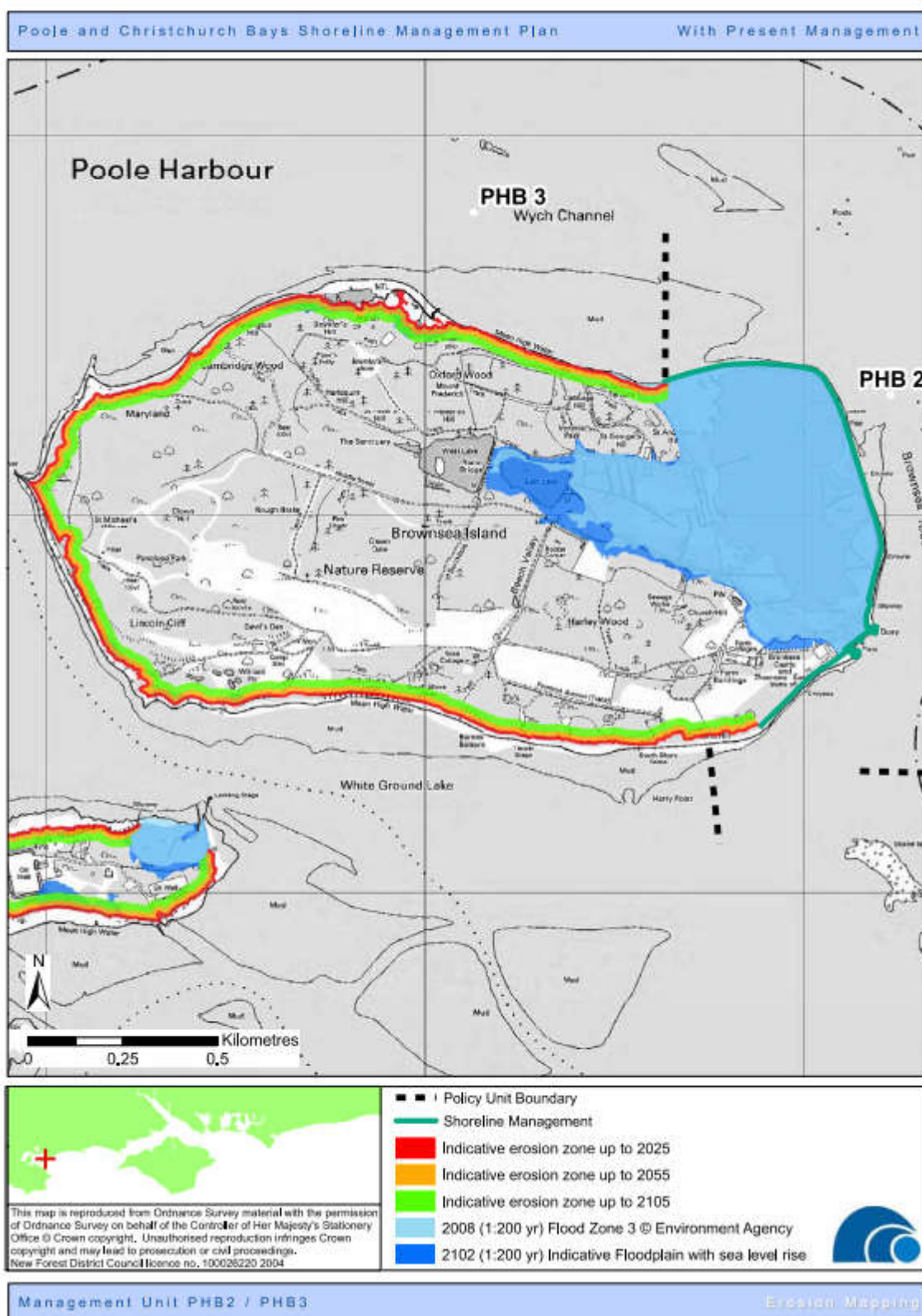
<sup>5</sup> Ref ID: 7-072-20140306

Flood Zone 3 and is likely to be at risk from tidal flooding as a consequence of rising sea levels, but does not show indicative erosion zones along this section of coastline. (Map 1)

10. Management Unit PHB 2 also includes Furzey Island. The SMP does not show indicative erosion zones around the north eastern edge of the island's shoreline. This land is at risk from tidal flooding (Flood Zone 3 and forming part of an indicative floodplain with sea level rise up to 2102). (Map 1)
11. The western side of Poole Harbour, between Hydes Bay and Holton Point, is described as Management Unit PHB 5. The low lying, and predominantly flat, landform in this management unit, coupled with its relationship with the Rivers Frome and Piddle, means it is at risk from fluvial and tidal flooding. The SMP does not show indicative erosion zones along this section of coastline. (Map 3)

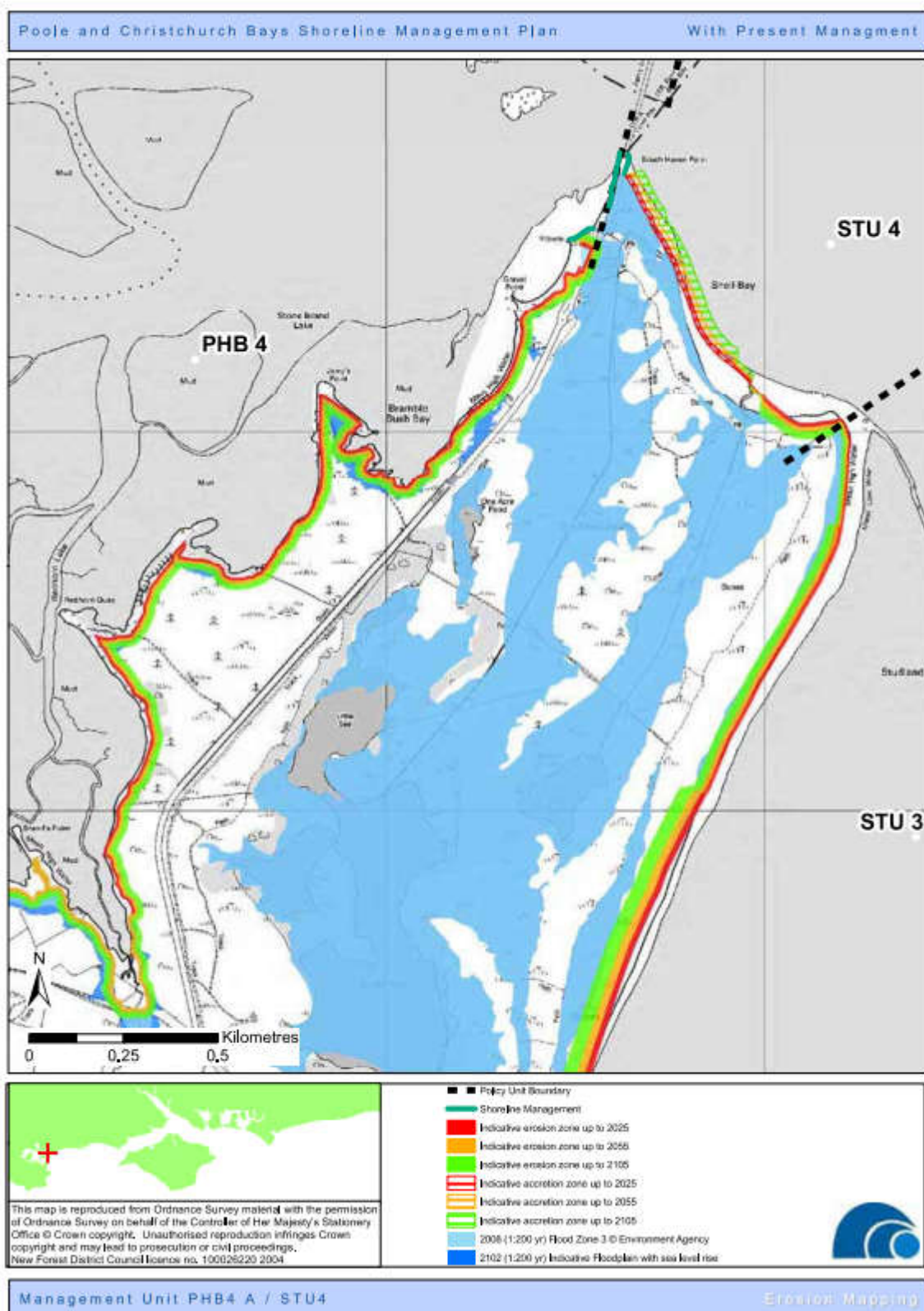
### **Sections of the coastline where there is existing coastal management**

12. The Poole and Christchurch Bays SMP also models anticipated erosion / accretion taking account of 'no intervention' and a continuation of 'present management'. The SMP indicates that there is existing shoreline management within Management Units: PHB 2 (Brownsea Island), PHB 4 (Studland Peninsula – adjacent to slipway for Studland Ferry and Shell Bay Boatyard), PHB 5 (Arne Moors and Keyworth Point), PHB 6 (Lytchett Bay), STU 4 (Middle Beach Studland), SWA 1 and 2 (Swanage Bay – between Peveril Point and Ballard Estate) and DR 1 and 2 (Durlston Bay). The SMP anticipates accretion in Management Unit STU 4 (Shell Bay).
13. The Durlston Head to Rame Head SMP shows erosion lines over three time horizons (0-20 years, 20-50 years and 50-100 years). The SMP does not model erosion taking account of current shoreline management as in the Poole and Christchurch Bays SMP. Despite this difference the Durlston Head to Rame Head SMP does give policy recommendations for future management. For the section of coastline in Purbeck District Council's administrative area the SMP recommends 'No Active Intervention' in both the short, medium and long term along its whole length, other than in Kimmeridge Bay (Unit Policy 5g03) and Lulworth Cove (Unit Policy 5g07) where it recommends 'Managed Realignment' in the medium and long term.
14. The maps in the next section of this report show selected management units from the Poole and Christchurch Bays SMP which have been referenced in the paragraphs above. The maps also show the approximate position of shoreline management features and anticipated erosion zones over three time horizons with existing coastal management.

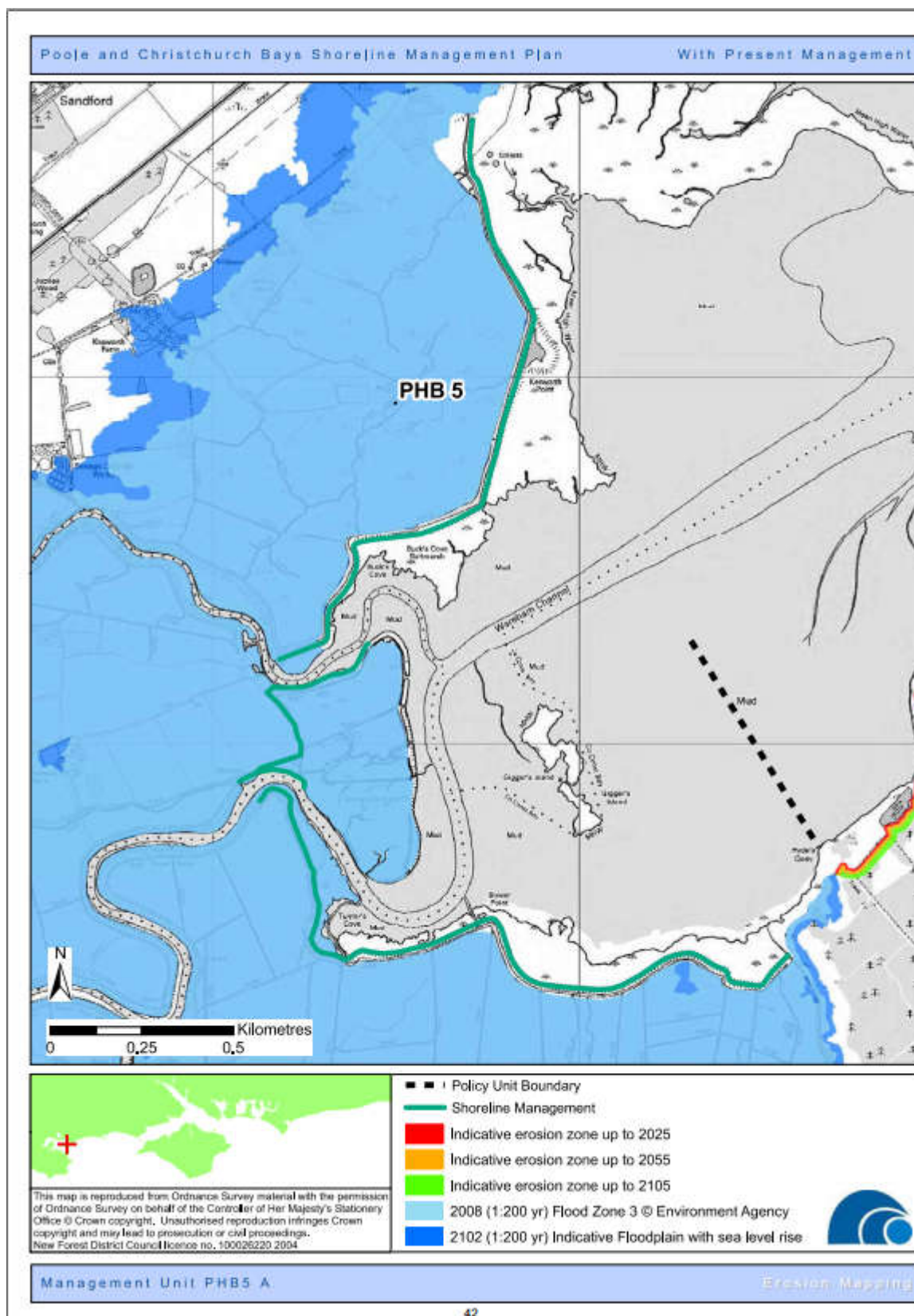


Map 1: Management Units PHB 2 and 3 of the Poole and Christchurch Bays SMP Review (2011)



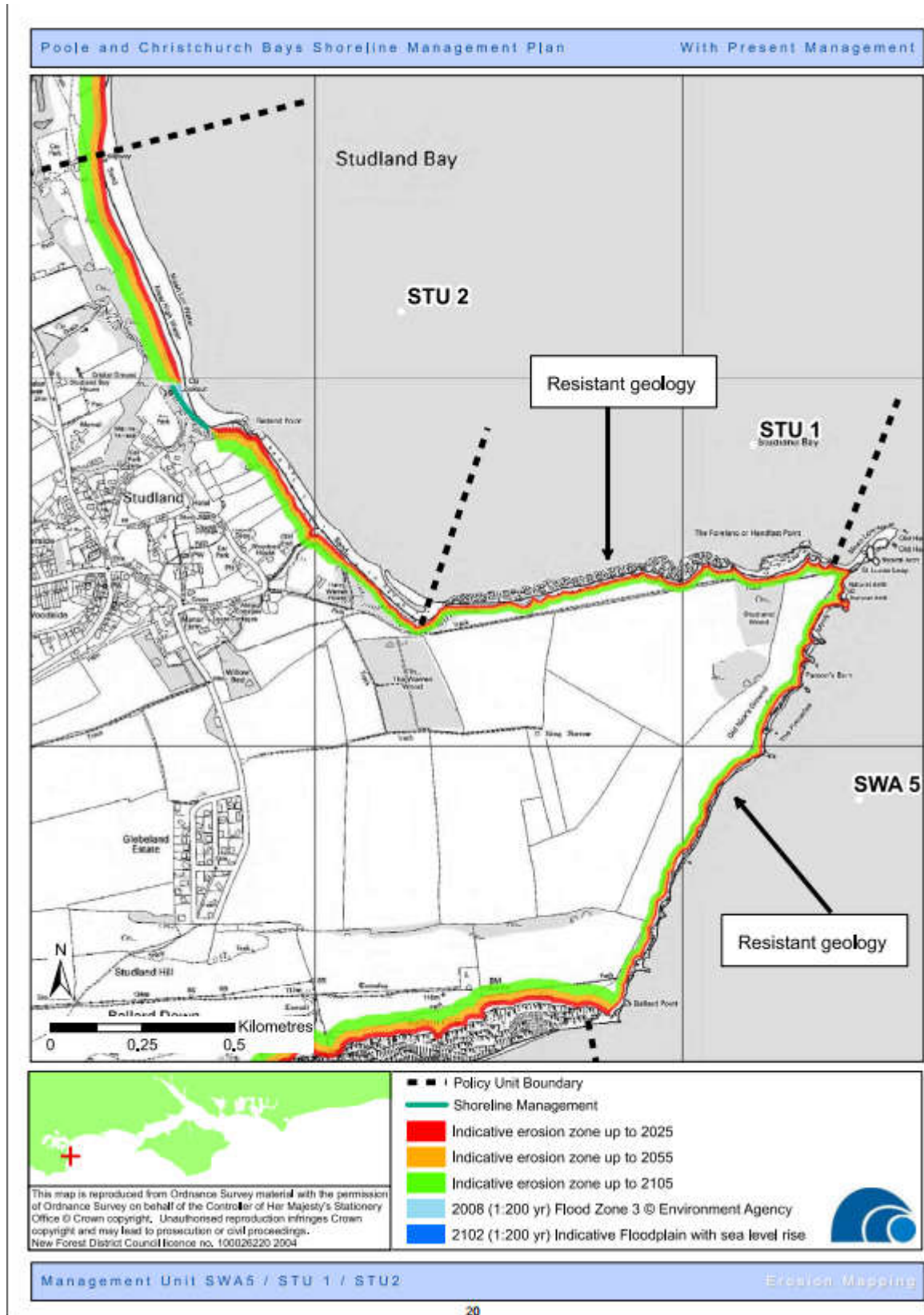


Map 2: Management Units STU 4 and PHB 4 of the Poole and Christchurch Bays SMP Review (2011)

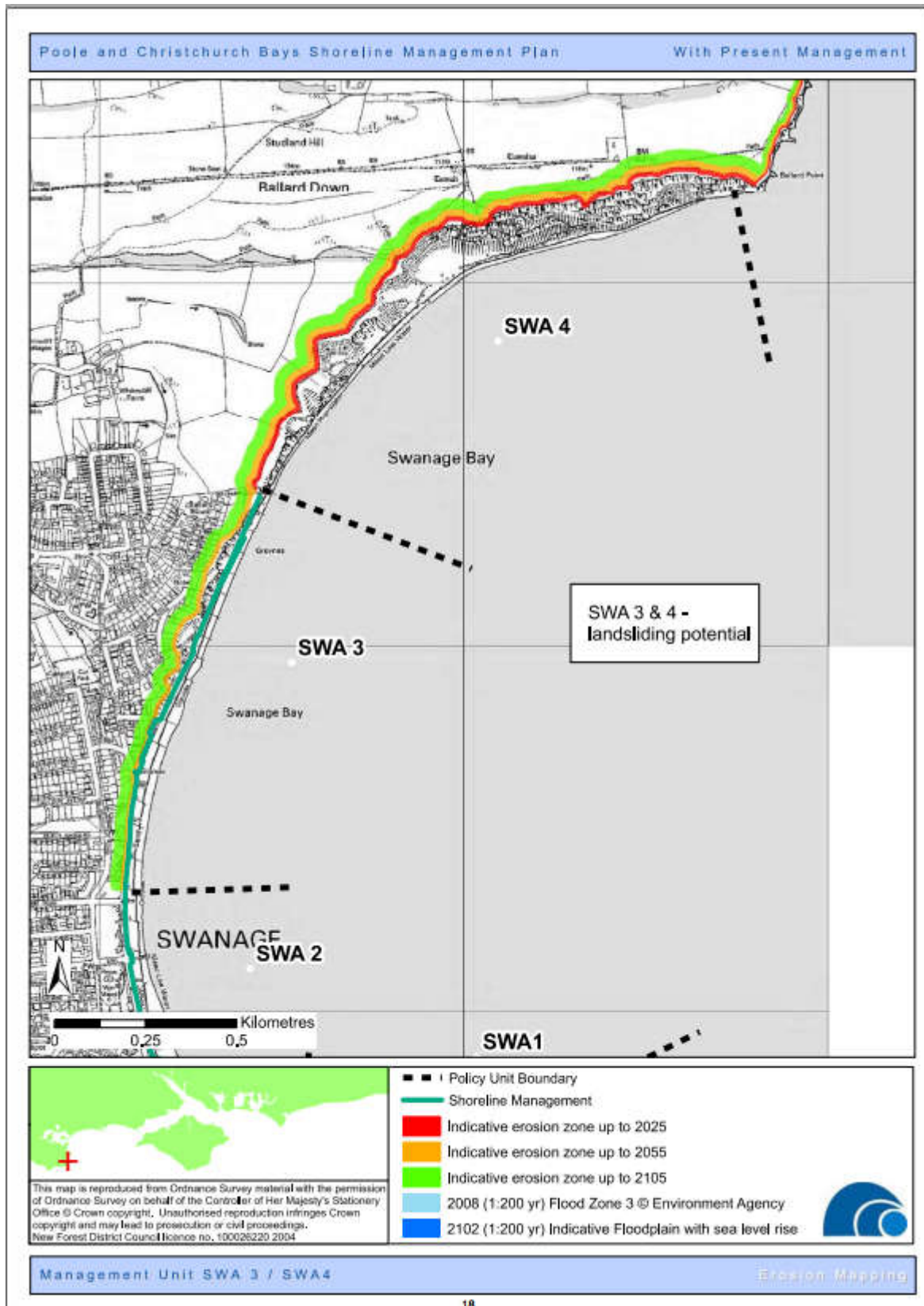


Map 3: Management Units PHB 5 of the Poole and Christchurch Bays SMP Review (2011)



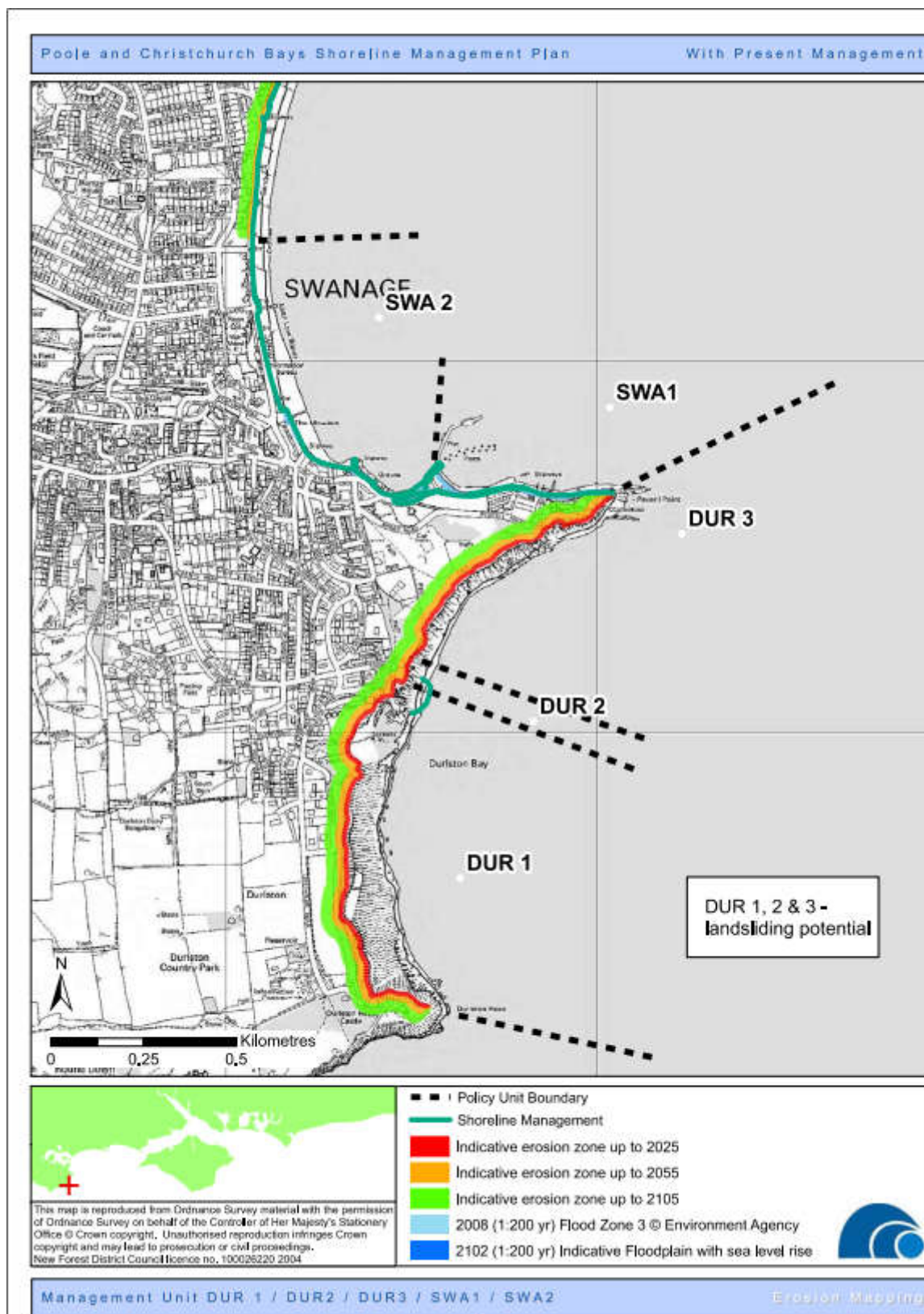


Map 4: Management Units STU 2 of the Poole and Christchurch Bays SMP Review (2011)



Map 5: Management Units SWA 2 and 3 of the Poole and Christchurch Bays SMP Review (2011)





Map 6: Management Units SWA 1 and 2 and DUR 1 and 2 of the Poole and Christchurch Bays SMP Review (2011)

15. In Management Unit PHB 5 (Map 3) the Environment Agency (EA), Royal Society for the Protection of Birds (RSPB) and Natural England (NE) have started a consultation on the future management of existing coastal defences in this management unit.

### **The Councils approach to defining CCMA**

16. The Council has:
- Used the indicative / predictive erosion zones (up to 2105 for the Poole and Christchurch Bay SMP and up to 100 years for the Durlston Head to Rame Head SMP) from the SMPs to identify CCMA.
  - Used the erosion zones that were ‘modelled without active intervention’ in the Poole and Christchurch Bays SMP, as it has not been possible to obtain evidence to demonstrate that policy recommendations to hold or advance the line in SMPs will be secured over their lifetime.
  - Not identified CCMA in management units from the Poole and Christchurch Bays SMP where there are no details of indicative erosion up to 2105. Including land in Management Units PHB 2, 3, 4 and 5 in Poole Harbour. (The Council will consider reviewing the policy pending publication of further evidence relating to coastal change in these areas).
17. The Council’s CCMA do not distinguish between the indicative erosion zones / erosion lines over the three time horizons in the SMPs. The CCMA in the Purbeck Local Plan combine all of the land from each of the time horizons (to 2025, 2055 and 2105 which the shoreline management plans indicate will be affected by coastal change) into a single zone. (Applicants will wish to take this into consideration when preparing a vulnerability assessment for development within a CCMA). Purbeck’s CCMA are identified on the Purbeck Local Plan Policies Map.



## Developing a local policy

### What development will be appropriate in CCMA's?

18. NPPG<sup>6</sup> says that essential infrastructure may be permitted in a CCMA, provided there are clear plans to manage the impacts of coastal change on it, and it will not have an adverse impact on rates of coastal change elsewhere. This will include Ministry of Defence installations.
19. For other types of development, the NPPG has a short, medium and long term split. The short term is deemed to be up to 20 years and includes a limited range of development linked to the coast, such as beach huts, cafes/tea rooms, car parks and sites used for holiday or short-let caravans and camping. All would have to have time-limited planning permissions.
20. NPPG states that in the medium (20-50 years) to long term (up to 100 years), some time-limited development, such as hotels, shops, office or leisure activities with substantial social and economic benefits to the community, may be appropriate. Other key community infrastructure may be appropriate, provided it can be demonstrated that it has to be located within the CCMA and there are clear, costed plans to manage the impact of coastal change and the service it provides. The NPPG is clear in stating that new residential development will not be appropriate within a CCMA.
21. The Council has followed the prescriptive guidance in NPPG on essential infrastructure, Ministry of Defence installations and new homes in CCMA's. The Council's policy is presented in the environment chapter of the Purbeck Local Plan as 'Policy E6: Coastal change management areas'.
22. The guidance in NPPG relating to the suitability of other development within CCMA's is less prescriptive. In order to assess whether other development might be appropriate NPPG suggests that councils should take account of:
  - Whether the risks from coastal change are short / medium / long term.
  - The nature of the development (e.g. does the development require a coastal location).
  - Wider benefits (e.g. will the development deliver wider economic and social benefits).
23. Policy E6 in the Purbeck Local Plan requires applicants to prepare a vulnerability assessment to allow the Council to determine whether their development would be appropriate.

### Making provision for development and infrastructure that needs to be relocated away from CCMA's

24. The NPPG<sup>7</sup> advises that it may be appropriate for local plans to formally allocate land for the relocation of development and habitat affected by coastal change. There are several buildings / existing uses, particularly in Swanage,

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<sup>6</sup> Ref ID: 7-073-20140306

<sup>7</sup> Ref ID: 7-076-20140306

within the CCMA's. The Council has not sought to make allocations for this development because most of these properties are not likely to be at risk from coastal change over the life time of the Purbeck Local Plan (up to 2034) and because of the small numbers of buildings / existing uses involved. The Council's policy includes a contingency which allows development to relocate subject to a case by case assessment if the coastline erodes more quickly than anticipated.

### Permitted development

25. Permitted development is development that does not require planning permission. The NPPG<sup>8</sup> advises councils to consider revoking permitted development rights for extensions and alterations that are likely to result in an increase in the scale of property and number of occupants at risk from coastal change in the short term (i.e. next 20 years). This would mean that proposals, which would have previously not required planning permission, would be assessed having regard to Policy E6.
26. There are no properties at short term risk from coastal change over the next 20 years – for these reasons the Council has not considered any Article 4 directions as part of the Purbeck Local Plan. This matter will need to be re-considered as part of the preparation and drafting of subsequent plans.

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<sup>8</sup> Ref ID: 7-077-20140306

## Conclusion and recommendations

27. This evidence paper explains how the Council has interpreted relevant national planning policy and guidance to identify CCMAAs and prepare a planning policy for the Purbeck Local Plan.

## Glossary

CCMA – coastal change management area

NPPF – National Planning Policy Framework

PLP1 – Purbeck Local Plan Part 1

NPPG – National Planning Practice Guidance

SMP – shoreline management plan