



Purbeck Core Strategy Development Plan Document

Examination into the soundness of the plan

Statement on behalf of Purbeck District Council

Hearing date: Thursday 18 May 2012 – 10am

Matter 17: Flood Risk, Groundwater Protection, and Coastal Erosion (Policies FR, GP and CE)

Issues

17.1 Can issues of flood risk, groundwater protection and coastal erosion be appropriately overcome?

Introduction

1. This statement considers all the issues within Matter 17: Flood Risk, Groundwater Protection, and Coastal Erosion (Policies FR, GP and CE).

Statements of common ground

2. No statements of common ground have been submitted in relation to this Matter.

Why the Council considers the Core Strategy sound

3. Each issue raised by the Inspector is considered in turn below:

17.1 Can issues of flood risk, groundwater protection and coastal erosion be appropriately overcome?

Flood Risk

4. The Council has identified that the issues associated with flood risk in Purbeck are tidal, fluvial and surface water flooding and has prepared Policy FR to address them. Officers have liaised closely with The Environment Agency (EA) throughout the preparation of the Core Strategy and the EA stated in representations that they have no objections in principle to Policy FR.
5. The Core Strategy was written to conform to the requirements of the now deleted PPS25: Development and Flood Risk. Nonetheless, it still conforms to the National Planning Policy Framework (NPPF) and its Technical Guide. Flood risk has comprehensive coverage in the NPPF and there is no need to repeat national policy unnecessarily in the Core Strategy because the two will be read alongside each other. Policy FR provides additional detail as to when a flood risk assessment is required.
6. Core Strategy Policy FR is informed by a Strategic Flood Risk Assessment¹ (SFRA), which is updated annually. The three allocated housing sites in the Core Strategy lie within flood zone 1, where there is the least likelihood of flooding.
7. A representation has raised concerns that tidal flooding in Swanage is being ignored. The SFRA does not explicitly mention tidal flooding under a specific heading. The Council has addressed this issue under several sections of the SFRA, for example sections 6.4 and 6.5. It is important that Swanage town centre remains developable for future regeneration schemes, which may be allocated in the forthcoming Swanage Area Action Plan. The town centre is located in flood zones 2 and 3 and therefore it will be unavoidable that future regeneration projects will be located within these flood zones. However, sites will not be developed unless appropriate mitigation can be put in place.
8. The Shoreline Management Plan² (SMP) raised questions about tidal flooding and these are being investigated through the Environment Agency's forthcoming Poole

¹ CD45: Purbeck Strategic Flood Risk Assessment (2011)

² CD41: Poole and Christchurch Bay Shoreline Management Plan (SMP2) and CD42: Durlston Head to Rame Head Shoreline Management Plan (SMP2) Consultation Draft (2009)

Bay, Poole Harbour and Wareham Flood and Coastal Erosion Risk Management Strategy. This is scheduled for adoption in summer 2013.

Groundwater Protection

9. The Council has identified that the issue associated with groundwater protection is the quality and quantity of the water supply in chalk valleys. Policy GP: Groundwater Protection seeks to only allow development where there is no risk to the quality or quantity of groundwater.
10. Groundwater protection is the remit of the EA and the EA have stated through representations that they support the Council's approach in Policy GP.
11. Representations from Natural England and RSPB have raised concerns over the effects of nitrates on Poole Harbour water quality. This issue has also been highlighted in the Habitats Regulations Assessment³ as an adverse effect. The Council introduced Policy PH: Poole Harbour into the Proposed Changes stage of the Core Strategy and has resolved the issue⁴. The Council is currently working with Natural England, Wessex Water, the EA, the Borough of Poole and West Dorset District Council to explore possible mechanisms for implementing the policy.

Coastal Erosion

12. The Council has identified that the issues associated with coastal erosion are cliff stability from soakaways and the impacts of sea level rise.
13. To address cliff stability, Policy CE: Coastal Erosion introduces a zone along the District's southern coastline called the 400m No-water Discharge Consultation Zone. Within this zone, proposals must demonstrate how water will be discharged without affecting cliff stability.
14. To address the impacts of sea level rise, the policy allows the identification of Coastal Change Management Areas (CCMAs) where development can be controlled.
15. Objectors have raised concerns that Policy CE fails to recognise the need to protect local beaches, particularly in Swanage, where sea level rise will make beaches smaller. The SMP recommends 'hold the line' (maintaining sea defences) in Swanage and CCMAs will look in detail at how development can be controlled.
16. The Council is aware of coastal erosion issues, but the implications of coastal erosion are beyond the plan period. However, Dorset County Council and Purbeck District Council are already planning for adaptation to climate change and to resolve conflicts between loss of property and sea level rise. Therefore, the Core Strategy can only highlight issues at this stage while they are still under investigation. Clearly, significant work still needs to be carried out. This will be reflected in a subsequent plan(s).
17. A recent Dorset Pathfinder project has investigated various possible scenarios for climate change and considered the proposal within the SMP to install a groyne in

³ SD6: Habitats Regulation Assessment for Core Strategy Pre-Submission 2010

⁴ SD16: Habitats Regulation Assessment for Proposed Changes to Core Strategy Pre-Submission 2011

Swanage Bay. This would help retain the sand on Swanage beach. However, the downside of this approach could be the loss of property to the north of Swanage where the SMP strategy is managed realignment (allowing the coast to erode naturally). The Swanage Climate Change Coastal Forum is currently discussing implications and an INTERREG project called Living with a Changing Coast (LiCCo) is looking at raising awareness of climate change and how communities can adapt successfully.

18. The EA has not submitted any representations objecting to Policy CE.

Suggested changes for the Inspector to consider

19. Amend Policy CE as per changes 91-92 of the Minor Changes Schedule⁵.

20. The Council requests a change to paragraph 2.18 in order to provide more background information on coastal erosion in Swanage. It will replace the second bullet point shown in change number 13 of the Minor Changes Schedule:

‘Swanage: The beach requires a regular recharge to maintain the sand on the beach and was last undertaken in 2006. There are concerns over coastal defences, in particular overtopping of the sea wall. The centre of Swanage is susceptible to flooding from sea, river and surface water and an INTERREG project called Living with a Changing Coast (LiCCo) is currently looking at raising awareness of climate change and how communities can adapt successfully. In the longer term, the policy option in the Shoreline Management Plan not to protect the coastline in North Swanage from erosion, may lead to loss of property. A Pathfinder project explored adaptability to climate change from the local community’s perspective and from this a Swanage Coastal Change Forum has been set up. Further information on coastal erosion will be available to the public through the forthcoming National Coastal Erosion Risk Mapping project’.

⁵ SD26: Minor Changes Schedule