

Combined LPC and CC response to Further Comments of the Independent Examiner

HRA Screening

Ludgvan's Response to Examiner's Further Comments – November 2019

Long Rock Settlement Boundary

Ludgvan agrees to the line of the settlement boundary being reinstated. Please find attached a new map to reflect the changes requested.

Coastal Change Management Area (CCMA)

Cornwall Council Response

The issue appears to be one of terminology and I agree that the map which was sent is not the one which should be inserted into the document. It may, however, be useful to you as background evidence when you consider your recommendations.

The National Planning Policy Framework (NPPF) describes a CCMA as 'any area likely to be affected by physical changes to the coast' and Cornwall Council further refine this definition to include the communities affected by coastal change. CCMA's should only be established where rates of shoreline change are significant over the next 100 years, taking account of climate change.

If a parish establishes a CCMA in their Neighbourhood Development Plan (NDP), then there are options to define various zones within the CCMA, within which different policies can apply. This may include:

- An **Exclusion Zone**, where no, or limited development can take place.
- A **Vulnerability Zone**, which is an additional extension to the Exclusion Zone, where other policies, such as rollback, may operate. Further evidence would be required to justify the extent of a vulnerability zone.

To identify which areas of the Cornish Coast are predicted to experience significant rates of shoreline change over the next 100 years, we use the Cornwall Coastal Vulnerability Map (CCVM.) This is the map which was provided to you. The CCVM shows where land and development may be susceptible to coastal change over the next 100 years. NDPs whose area falls within the CCVM are encouraged to consider defining a CCMA.

The CCVM is based upon the National Coastal Erosion Risk Mapping (NCERM) prediction, with a 5% probability of it being an underestimate over the long term. To seaward, the line extends to mean Low Water Springs (MLWS). A

buffer of 10m is added to the line of the area because residential development may be permitted beyond the CCVM and we do not wish to permit housing which, during its lifetime, might become immediately adjacent to the cliff or shoreline edge. This area is called the **Exclusion Zone**; residential development should not be supported within this area and, in limited circumstances, only development which is compatible may be allowed within the defined area. Examples of compatible development are listed in the draft Chief Planning Officer Note on [Coastal Change](#) but the general aim is to discourage development in the Exclusion Zone.

The Ludgvan NDP policy correctly describes the CCVM + 10 m Exclusion Zone and contains policy to control development within the Exclusion Zone. It does not choose to identify a further vulnerability zone; this is only an option, and is not required. I wonder whether the following additions, and the inclusion of a simpler map (attached), will satisfy your concerns and clarify the policy.

Policy No. LUD4

Coastal Change Management Area

The whole length of coastline boundary of the Parish is designated a Coastal Change Management Area **and an Exclusion Zone is defined, as shown on Map 5.**

Proposals for development ~~adjacent to the coastline boundary~~ **within the Exclusion Zone*** must comply with the principles for coastal management of this part of the Plan area in the most recent version of the Shoreline Management Plan and must demonstrate positive alignment with any current Coastal Improvements Plan.

New development will be supported within the ~~CCMA~~ **Exclusion Zone**, if it is:

- a) necessary for the management of the protected natural habitats ~~within the CCMA~~; or
- b) for coastal management purposes as identified in the Shoreline Management Plan; or
- c) for the ~~creation and~~ maintenance of a continuous, signed and managed route around the coast.

The creation of new habitats will be supported within the ~~CCMA~~ **Exclusion Zone**, particularly where opportunities are identified in the most recent Shoreline Management Plan.

* The ~~CCMA~~ **Exclusion Zone** extent is defined by the latest and current Cornwall Coastal Vulnerability Map (CCVM) held and applied by Cornwall Council as the Coast Protection Authority. This map ~~shows~~ **includes** a minimum width of CCMA of 10m landward from **the current predicted 100 year** coastal erosion line as shown on the CCVM.

Subsequent maps would require renumbering.





0 0.25 0.5 1 1.5 Kilometers

Ludgvan Parish

© Crown copyright and database rights 2019 Ordnance Survey 100049047
Zemmer Developments and Policy 16/018

Key

-  Ludgvan Parish
-  Coastal Change Management Area – Exclusion Zone



