

# Broads Authority

24 July 2020

Agenda item number 13

## Draft Coastal Adaptation SPD for consultation

Report by Planning Policy Officer

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### Summary

Coastal change is an inevitable part of a dynamic coastline. The risk of coastal flooding and vulnerability to erosion along the coast does not respect local planning authority boundaries, and therefore coastal change needs to be considered across a wide geography. A partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the shared Coastal Partnership East team is producing a Coastal Adaptation Supplementary Planning Document (SPD) to provide guidance on aligned policy approaches along the coast and to take a holistic (whole coast) approach. The SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice.

### Recommendation

- (i) To endorse the Coastal Adaptation SPD for consultation; and
  - (ii) As four Local Planning Authorities are jointly producing this SPD, and some committees may make comments on the SPD that result in changes, that final Authority endorsement for consultation is delegated to the Director of Strategic Services in consultation with the Chairman of the Broads Authority and the Chair of Planning Committee.
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## 1. Introduction

- 1.1. The Local Planning Authorities (LPAs) of North Norfolk District Council, Great Yarmouth Borough Council, East Suffolk Council and the Broads Authority have a history of working together in relation to planning and the coast. For example, a [Statement of Common Ground on Coastal Zone Planning](#) was agreed between the partnership authorities in September 2018 and the Councils have formed Coastal Partnership East,<sup>1</sup> the shared coastal management team of North Norfolk District Council, Great Yarmouth Borough Council and East Suffolk Council covering the entire area of those Councils.

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<sup>1</sup> The Broads Authority is not directly involved in Coastal Partnership East (CPE), but the area covered by CPE includes the stretch of coastline in the Broads Executive Area.

- 1.2. Following on from the Statement of Common Ground the four LPAs, with Coastal Partnership East (CPE), are producing a Coastal Adaptation Supplementary Planning Document (SPD).
- 1.3. This report introduces the first stage of public engagement in producing this SPD.
- 1.4. Please note that this report and the SPD went to the July meeting of the Planning Committee. The deadline for this report was before that meeting was held. Any comments from Planning Committee will be reported to the Broads Authority at the meeting.

## **2. About Supplementary Planning Documents (SPDs)**

- 2.1. An SPD cannot create new or amend existing planning policies, nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the Development Plan. The purpose of SPDs is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies. When adopted, the SPD will be a material consideration in determining planning applications.
- 2.2. The Coastal Adaptation SPD will be linked to Policy SSCOAST in the Local Plan for the Broads:

‘Coastal area defined on the Adopted Policies Map and its special nature, character and tranquillity will be conserved for low-key quiet recreation and as a wild bird and seal refuge. In order to further these purposes, and in view of the high flood and tidal inundation risk to the area, operational development will generally not be permitted. Exceptionally, small-scale development such as bird-watching hides, seal viewing platforms or footpath bridges, which further these aims, are consistent with managing recreational pressure (particularly in relation to Special Protection Area and Special Area of Conservation features), and are unobtrusive in the landscape will be supported’.

## **3. The coast in the Broads Authority Executive Area**

- 3.1. There is a small stretch of coast in the Broads Authority Executive Area at Horsey. The coastal area of the Broads has a very special character and tranquillity, and is of wildlife and landscape importance. It is highly valued for walking and for bird and seal watching. It is also particularly vulnerable to climate change and sea level rise, and has been subject to sporadic coastal inundation for centuries (it was once the river mouth), with parts at risk of riverine flooding. This area of coast is also vulnerable to coastal erosion. This small stretch of coastline is part of the North Norfolk Area of Outstanding Natural Beauty and wholly in the Special Area of Conservation and partially within the Special Protection Area.

## 4. The Coastal Adaptation SPD

- 4.1. Coastal change is an inevitable part of a dynamic coastline. This presents a challenge in planning for the appropriate management of our coastlines.
- 4.2. The risk of coastal flooding and vulnerability to erosion along the coast does not respect local planning authority boundaries, and coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines to address the issues of coastal management and planning.
- 4.3. The Draft Coastal Adaptation SPD is at the first stage of consultation, the aim of which is to get feedback on what the SPD should address. The consultation documents include background information and questions for stakeholders, and is a scoping exercise.
- 4.4. The next version of the draft SPD will include requirements and will also be subject to consultation. As the SPD passes through various committees at different Local Planning Authorities, the time frame for the overall consultation will become clearer and the dates finalised. East Suffolk Council will format the SPD.

## 5. Consultation – scoping stage

- 5.1. It is intended to run the consultation for at least four weeks in August/September. This timeline has been set because of the need for the document to be endorsed for consultation by the four LPAs and reflects when various meetings are to be held.
- 5.2. At the time of writing, the actual approach to the consultation is being finalised as it needs to take account of the four LPA Statements of Community Involvement. It is likely to involve the following actions, to reflect COVID-19 access restrictions:
  - Documents placed on websites
  - Promotion through social media
  - Notification to those on consultation databases
  - Hard copies of the documents made available on request
  - If head offices are open, access to view hard copies, potentially by appointment (Note: In the case of the Broads Authority the document will be fixed on the window of the office so that it can be easily viewed from the street and not require entry to the building).
  - Phone numbers published for each LPA and the Coastal Partnership East for those wanting to ask questions

## 6. Next steps

- 6.1. After this scoping consultation stage, the responses will be assessed and the draft SPD produced. This will then go before the various Committees of the four LPAs before

being subject to a second public consultation. Once those responses are assessed, the final SPD will be produced for adoption by the four LPAs. This process could take up to 12 months, depending on comments received.

## **7. Financial implications**

- 7.1. There may be a need to contribute to a press advert to advertise the various stages of producing the SPD. The cost will be shared across the Authorities. This could be up to £500 and would be paid for through the Planning Policy Budget.

Author: Natalie Beal

Date of report: 02 July 2020

Appendix 1 – Coastal Adaptation Supplementary Planning Document.

## Appendix 1

# Draft Coastal Adaptation SPD

## Initial consultation document

Consultation dates ... August 2020 – ... October 2020

Coastal Change is an inevitable part of a dynamic coastline. Therefore, this presents a challenge in planning for the appropriate management of our coastlines.

The risk of coastal flooding and vulnerability to erosion along the coast does not respect local planning authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines in addressing the issues of coastal management and planning.

The Draft Coastal Adaptation Supplementary Planning Document (SPD) is at the first stage of consultation, the aim of which is to gather feedback on what you think the SPD should address. Your time in providing comments is greatly appreciated. Please respond to this consultation by 5pm on ... October 2020.

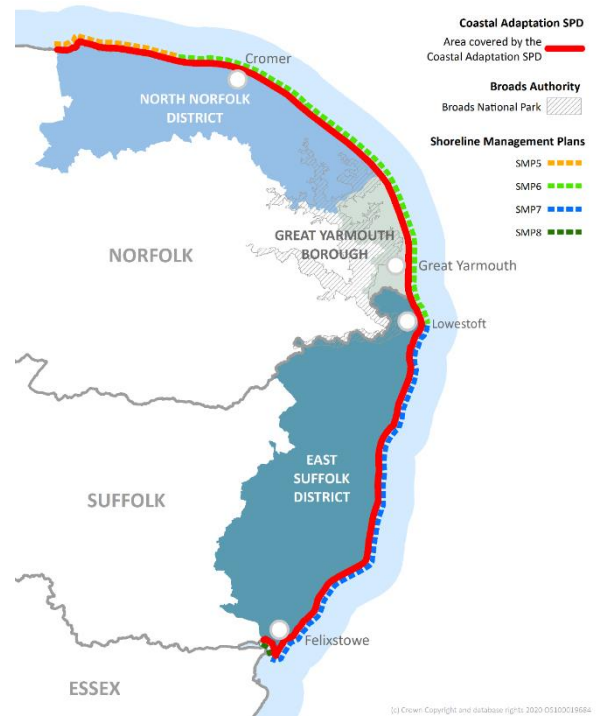
Please respond by one of the following routes:

- Complete the [online questionnaire](#),
- Email your response to [planningpolicy@eastsoffolk.gov.uk](mailto:planningpolicy@eastsoffolk.gov.uk), or
- Post your response to Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ



# About the SPD

A partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team<sup>2</sup> is at an early stage in preparing a Coastal Adaptation SPD. The purpose of this SPD is to provide guidance on aligned policy approaches along the coast and to take a holistic (whole coast) approach, which follows from the [Statement of Common Ground on Coastal Zone Planning](#) agreed between the partnership authorities in September 2018. In doing so, this SPD will ensure planning guidance is up to date, aid the interpretation and delivery of planning policy, and provide case study examples of coastal adaptation best practice.



The objectives of producing the SPD are:

- Ensuring Coastal Communities continue to prosper and can adapt to coastal change; and
- To provide detailed guidance to developers, landowners, and development management teams on the interpretation of policies with a whole coast approach.

An SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the Development Plan. The purpose of SPDs therefore is to provide guidance on the correct interpretation of planning policy and aid the implementation of relevant policies. When adopted the SPD will be a material consideration in determining planning applications.

The SPD will provide guidance relating to the following adopted and emerging Local Plans:

- Waveney Local Plan (2019)
- The Broads Local Plan (2019)
- Emerging Suffolk Coastal Local Plan
- Emerging Great Yarmouth Borough Council Local Plan
- Emerging North Norfolk District Council Local Plan

This SPD will replace the following existing planning guidance:

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<sup>2</sup> Coastal Partnership East is the shared coastal management team of North Norfolk District Council, Great Yarmouth Borough Council and East Suffolk Council.

- [‘Coastal Erosion and Development Control Guidance’ \(2009\)](#)<sup>3</sup> covering North Norfolk District Council, and
- [‘Development and Coastal Change SPD’ \(2013\)](#)<sup>4</sup> covering the former Waveney area which now forms part of East Suffolk Council.

## Links to Shoreline Management Plans (SMPs)

Shoreline Management Plans (SMPs) provide coastal authorities with an opportunity to assess the risks associated with coastal processes<sup>5</sup> and long-term implications<sup>6</sup> for protecting the coast. The eastern half of [SMP5 'Hunstanton to Kelling Hard'](#), [SMP6 'Kelling Hard to Lowestoft Ness'](#), [SMP7 'Lowestoft Ness to Felixstowe Landguard Point'](#) and the northern most point of [SMP8 'Landguard Point to Two Tree Island'](#) cover the coastal area to which this SPD relates. As key sources of evidence SMPs are integral to the formulation of Local Plan policy in respect of the coast, and as such reference will be made to relevant SMPs within this SPD.

## Proposed Content of the SPD

Drawing on case studies of coastal adaptation best practice this SPD is proposed to be structured around the following topic areas:

### **1. Context: Homes, Businesses, and Communities Affected by Coastal Change**

The opening section will set out the purpose for the preparation of the SPD, which is to aid those affected by coastal change, including through natural processes to and management of the coast. It should be noted that reference to coastal change is inclusive of the effects of climate change on the coast.

### **2. Coastal Management Measures and Policies**

This section will set out the powers bestowed upon coastal authorities and our partners that can be used to manage the coast, and coastal management policies and guidance established in Local Plans and national policy.

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<sup>3</sup> URL: <https://www.north-norfolk.gov.uk/info/planning-policy/current-local-plan/coastal-erosion-development-control-guidance/>

<sup>4</sup> URL: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/supplementary-planning-documents/development-and-coastal-change/>

<sup>5</sup> Natural coastal processes driven by geology, tides, weather and climate change.

<sup>6</sup> Implications include coastal erosion including beach and cliff losses and tidal flooding.

### **3. Development in the Coastal Change Management Area**

- a. Permanent and Temporary Development on the Coast
- b. Public Realm Infrastructure
- c. Coastal Erosion Vulnerability Assessment Guidance

The Coastal Change Management Area (CCMA) is 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. Development within and adjacent to the CCMA is managed to minimise risk to life and property, to avoid increasing the pressure for new or improved coastal defences, and to guard against development which could have adverse impacts on coastal erosion, coastal processes and vulnerability elsewhere. This SPD will provide clear guidance as to what development may be appropriate in such areas and in what circumstances.

### **4. Roll-back and Relocation Options**

Roll-back and relocation involves the movement of assets currently or soon to be at risk from coastal change to less vulnerable locations. This section shall provide guidance on appropriate roll-back and relocation options.

### **5. Delivery and Enabling Development**

This final section will focus on the implementation of planning policies, with attention paid to the circumstances whereby enabling development may be supported. Enabling development is development that would ordinarily be contrary to policy but would secure a particular public benefit which may outweigh the disbenefits of departing from policy.

The SPD will not:

- Create new or amend existing planning policies as this is the role of the Development Plan and National Policy, or
- Alter the approach to the management of the coast as this is the role of SMPs.



## Questions

We welcome comments on any part of this document; however, you may find the following questions helpful in structuring your comments.

- Do you consider the scope and proposed content of the SPD to be appropriate?  
Yes/No  
If no, please suggest how the scope and content of the SPD should be amended.
- Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?
- What guidance for development in the CCMA should be identified in the SPD? Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
- What guidance on temporary development within the CCMA should be included?
- What elements should be included within a Coastal Erosion Vulnerability assessment?
- What guidance on Roll-back and relocation options should be included?
- What guidance on enabling development should be included?
- What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
- Do you have any other comments which could help the partnership prepare the SPD?

## Next steps

The scope of the SPD will be informed by consultation responses and agreed between the partnership authorities, after which a full draft of the SPD will be prepared and then consulted on. The draft SPD will be supported by Strategic Environmental Assessment, Habitats Regulations Assessment and Equality Impact Assessment screening opinions and where necessary full assessments.

## About this consultation

Please respond to this consultation by 5pm on ... October 2020.

This consultation is being undertaken in accordance with each partnership authority's Statement of Community Involvement (SCI):

- East Suffolk Council SCI ([former Suffolk Coastal area SCI \(2014\)](#)<sup>7</sup> and [former Waveney area SCI \(2014\)](#)<sup>8</sup>),
- [Great Yarmouth Borough Council SCI \(2020\)](#)<sup>9</sup>,
- [North Norfolk District Council SCI \(2016\)](#)<sup>10</sup>, and
- [The Broads Authority SCI \(2020\)](#)<sup>11</sup>.

By responding to this consultation you are accepting that your name and response will be available for public inspection and published online in accordance with the Town and County Planning (Local Planning) (England) Regulations (2012). View the [data protection statement](#).

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<sup>7</sup> Former Suffolk Coastal area SCI (2014): <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/SCDC-Statement-of-Community-Involvement.pdf>

<sup>8</sup> Former Waveney area SCI (2014): <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Statement-of-Community-Involvement/1Statement-of-Community-Involvement-September-2014.pdf>

<sup>9</sup> Great Yarmouth Borough Council SCI (2020): [https://www.great-yarmouth.gov.uk/media/1224/Statement-of-Community-Involvement/pdf/Statement\\_of\\_Community\\_Involvement\\_Mar\\_2019.pdf](https://www.great-yarmouth.gov.uk/media/1224/Statement-of-Community-Involvement/pdf/Statement_of_Community_Involvement_Mar_2019.pdf)

<sup>10</sup> North Norfolk District Council SCI (2016): <https://www.north-norfolk.gov.uk/media/2823/statement-of-community-involvement-january-2016.pdf>

<sup>11</sup> The Broads Authority SCI (2020): [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0024/209337/Final-2020-SCI-31-Jan-2020.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0024/209337/Final-2020-SCI-31-Jan-2020.pdf)