

# Broads Authority

22 September 2023

Agenda item number 10

## Coastal Adaptation SPD- Adoption

Report by Planning Policy Officer

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### Summary

The Coastal Adaptation Supplementary Planning Document (SPD) is a joint document prepared with Great Yarmouth Borough Council, North Norfolk District Council, East Suffolk District Council, the Broads Authority, and Coastal Partnership East. The Coastal Adaptation SPD is an example of cross boundary working to support the common goal of coastal adaptation. On adoption, the Coastal Adaptation SPD will be a material consideration in the determination of planning applications.

### Broads Plan context

A1 – Prepare a long-term integrated flood risk strategy for the Broads, Great Yarmouth and inter-related coastal frontage and maintain current adaptive, coastal, tidal and fluvial flood risk management for the area.

### Recommendations

- i. To adopt the SPD.
  - ii. To authorise the Head of Planning, in consultation with the Chair of Planning Committee, to make any presentational or typographical amendments to the Coastal Adaptation SPD prior to it being published.
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## 1. Introduction

- 1.1. The Coastal Adaptation SPD is a joint document prepared with Great Yarmouth Borough Council, North Norfolk District Council, East Suffolk District Council, the Broads Authority, and the shared Coastal Partnership East Team. The Coastal Adaptation SPD is an example of cross boundary working to support the common goal of coastal adaptation. On adoption, the Coastal Adaptation SPD will be a material consideration in the determination of planning applications.
- 1.2. The Coastal Adaptation SPD supports the implementation of policies relating to development within the Coastal Change Management Area, and rollback and relocation away from the coast in the East Suffolk Council, Great Yarmouth Borough Council, the Broads and North Norfolk Council areas. The purpose of the SPD is to provide guidance

on the implementation of local plan policies along the coast from Holkham in Norfolk to Landguard Point, Felixstowe in Suffolk. It is appended at Appendix 1 of this report.

- 1.3. The relevant policy in the Local Plan for the Broads is SSCOAST.
- 1.4. The SPD provides guidance including the economic, social and environmental impacts of coastal change; the national, and local policy framework; development within the Coastal Change Management Area; rollback and relocation; enabling development; and case study examples of coastal adaptation.

## 2. About the SPD

- 2.1. The Coastal Adaptation SPD contains guidance relating to the consideration of development on the coast and relocating development away from the coast, with the aim of avoiding inappropriate development on areas of the coast at risk of coastal change and the environmental impacts of such development.
- 2.2. The Coastal Adaptation SPD provides guidance on a range of topics including appropriate development within the Coastal Change Management Area, the requirements in relation to rollback and relocation of development away from the coast, consideration of enabling development proposals, and coastal adaptation case studies.
- 2.3. The Coastal Adaptation SPD cannot:
  - a) Conflict with planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the wider development plan (e.g. local plan and neighbourhood plan) for each local planning authority;
  - b) Create new, amend or revoke coastal management policies concerning the management of each stretch of coast relevant to the SPD contained in Shoreline Management Plans;
  - c) Address Nationally Significant Infrastructure Projects (NSIPs) – Large scale infrastructure development that is not determined by local planning authorities but by HM Government;
  - d) Address nationally permitted development rights – Development that does not require planning permission by virtue of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended; or
  - e) Address wider support for or calls for compensation arising from properties and/or land at risk of coastal change – with the exception of houses owned before 2009, where a Government grant for surveys/demolition may be available.

## 3. Preparation

- 3.1. The Coastal Adaptation SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- 3.2. The preparation of the Coastal Adaptation SPD has involved officers from the planning policy teams of the Local Planning Authorities (LPAs) as well as officers from Coastal Partnership East. The preparation of the document has been overseen by the Local Plan Working Group.

## 4. Consultation

- 4.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) require the LPAs to undertake consultation to inform the production of the SPD and, as a minimum, require that the draft document is published for four weeks and that during that time it is available on the relevant LPAs' websites and that physical copies are available for inspection in the LPAs offices. The LPAs adopted Statement of Community Involvement (April 2021) also sets out further measures and actions that the LPAs undertook when consulting on the draft SPD including publicising via social media sites and making copies of documents available in libraries.
- 4.2. The list of consultees, respondents, summaries of their comments and how these have been responded to can be found in the Consultation Statement which is appended to this report (Appendix 2).
- 4.3. The Coastal Adaptation SPD was subject to two rounds of consultation during its preparation, the details of which are contained in the Consultation Statement. The first was an initial consultation to inform the scope and content of the SPD. The initial consultation was carried out between 4 September and 16 October 2020. This initial consultation took the form of a questionnaire, to which 63 respondents made 288 comments. Summaries of the consultation responses, and how they were addressed in drafting the SPD, are contained in the Consultation Statement.
- 4.4. Consultation on the draft Coastal Adaptation SPD ran between 25 January and 8 March 2023. The consultation was advertised on the LPAs' websites, as well as on social media. Emails and letters were sent out at the start of the consultation to the consultees on the planning policy mailing list which includes town and parish councils, individuals and organisations, including those who were previously contacted or responded to the informal stage of the consultation. In total 52 respondents made 185 comments.
- 4.5. The main themes of the comments received are summarised in section 4.6; however, some of the comments covered very specific matters and it is not possible to summarise all of them here in a succinct manner. The full consultation responses have been published on the Council's consultation website (see - [Draft Coastal Adaptation Supplementary Planning Document - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)) and are all summarised in the Consultation Statement.
- 4.6. The main issues raised through the consultation on the draft Coastal Adaptation SPD were:
  - a) The SPD should address flood risk as well as erosion risk.

- b) The SPD should alter the planning policies contained in the Local Plans.
- c) The SPD should alter the coastal management approach for each stretch of the coast.
- d) The SPD is difficult to understand due to the use of jargon and technical language.
- e) Greater emphasis should be placed on the sensitive natural and historic environment along the coast.
- f) The SPD should address Nationally Significant Infrastructure Projects.
- g) Development at or near the coast should not hinder opportunities to realign the England Coast Path.
- h) The approximate appropriate distance that development may be relocated away from a settlement should be increased.
- i) Changes have been made to address many of the comments received, where appropriate, including:
- j) Clarification that the SPD does not address flood risk, which is assessed through other planning policies and site-specific flood risk assessments.
- k) Clarification that the SPD cannot alter planning policies contained in a Local Plan.
- l) Clarification that the SPD cannot alter the coastal management approach for any stretch of coast set out in Shoreline Management Plans.
- m) Avoiding jargon and technical language where possible, acknowledging that technical language may be necessary in some circumstances.
- n) Greater emphasis has been placed on the sensitive environment along the coast.
- o) Clarification that the SPD cannot address Nationally Significant Infrastructure Projects which are determined by HM Government.
- p) Development at or near the coast should not hinder opportunities to realign the England Coast Path.
- q) The approximate appropriate distance that development may be relocated away from a settlement has been increased.
- r) In addition, further changes have been made to address typographical and grammatical errors and to provide clarity on certain elements of guidance.

## 5. Strategic Environmental Assessment, Habitat Regulations Assessment and Equality Impact Assessment

- 5.1. Under the Environmental Assessment of Plans and Programmes Regulations 2004 screening was carried out on the draft Coastal Adaptation SPD to determine whether a full Strategic Environmental Assessment (SEA) would be required. The screening concluded that this was not required. The final SEA Screening Opinion is appended to this report (Appendix 5).

- 5.2. Habitat Regulations Assessment (HRA) screening was also undertaken which concluded that implementation of the Coastal Adaptation SPD would not lead to likely significant effects on protected Habitat Sites and that it is therefore not considered necessary to undertake an Appropriate Assessment. The final HRA Screening Statement is appended to this report (Appendix 4).
- 5.3. An Equality Impact Assessment (EQIA) Screening Opinion (Appendix 3) was produced in October 2022 to accompany consultation on the draft Coastal Adaptation SPD. The assessment concluded no differential negative impacts on those with protected characteristics.

## 6. Planning Committee August 2023

- 6.1. The SPD was discussed at Planning Committee on 18 August. The Committee endorsed the SPD and recommended that the Broads Authority adopt it.

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Date of report: 31 August 2023

[Broads Plan](#) strategic objective: A1

Appendix 1 – [Coastal Adaptation SPD](#)

Appendix 2 – [Consultation Statement](#)

Appendix 3 – [Equality Impact Assessment Screening Opinion](#)

Appendix 4 – [Habitats Regulations Assessment Screening Statement](#)

Appendix 5 – [Strategic Environmental Assessment Screening Opinion](#)