

Draft Coastal Adaptation Supplementary Planning Document

Covering the coast from Holkham in Norfolk to Felixstowe in Suffolk

Initial consultation document

Consultation dates 4 September 2020 – 16 October 2020

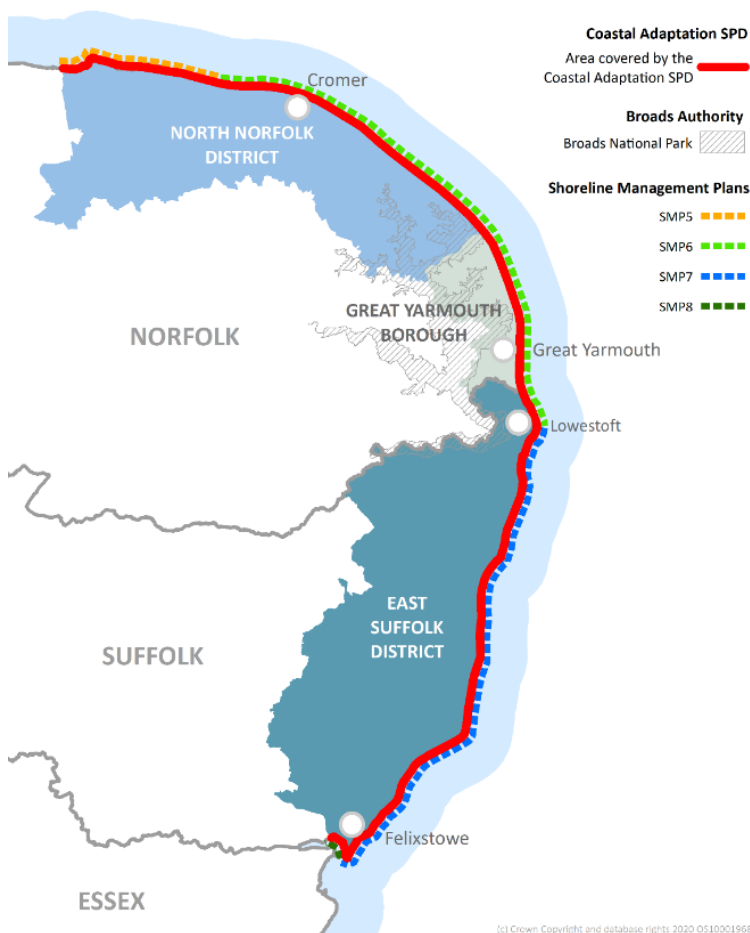


1 The purpose of this SPD

A partnership of East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East team is at an early stage in preparing a Coastal Adaptation Supplementary Planning Document (SPD)¹. 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](#) (appendix 1) 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 wider Development Plans of each Local Authority. 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.

¹ Coastal Partnership East is the shared coastal management team of North Norfolk District Council, Great Yarmouth Borough Council and East Suffolk Council.

The SPD will provide guidance relating to the following adopted and emerging Local Plans in relation to the coastal policies:

- Adopted Waveney Local Plan (2019)
- Adopted 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:

- [‘Coastal Erosion and Development Control Guidance’ \(2009\)](#)² covering North Norfolk District Council, and
- [‘Development and Coastal Change SPD’ \(2013\)](#)³ covering the former Waveney area which now forms part of East Suffolk Council.

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.

The Draft SPD is at the first stage of consultation, the aim of which is to gather feedback on what you think the SPD should address. The proposed content of the SPD is detailed in section 4. Your time in providing comments is greatly appreciated. Please respond to this consultation by 5pm on 16 October 2020, and via one of the following means:

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

² URL: <https://www.north-norfolk.gov.uk/info/planning-policy/current-local-plan/coastal-erosion-development-control-guidance/>

³ URL: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/supplementary-planning-documents/development-and-coastal-change/>

2 Coastal Change

Coastal Change is an inevitable part of a dynamic coastline. 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.

3 Links to Shoreline Management Plans (SMPs)

Shoreline Management Plans (SMPs) provide coastal authorities with an opportunity to assess the risks associated with coastal processes⁴ and long-term implications⁵ 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.

4 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

⁴ Natural coastal processes driven by geology, tides, weather and climate change.

⁵ Implications include coastal erosion including beach and cliff losses and tidal flooding.

established in Local Plans and national policy.

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.

5 Questions

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

1. 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.
2. Are there any elements of National or Local Planning Policy which should be particularly emphasised/explained in the SPD?

3. What guidance for development in the Coastal Change Management Area should be identified in the SPD?
4. Are the categories identified in section 3 appropriate and comprehensive or should others be identified?
5. What guidance on temporary development within the CCMA should be included?
6. What elements should be included within a Coastal Erosion Vulnerability assessment?
7. What guidance on Roll-back and relocation options should be included?
8. What guidance on enabling development should be included?
9. What case studies should be used in this SPD to demonstrate coastal adaptation best practice?
10. Do you have any other comments which could help the partnership prepare the SPD?

6 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.

7 About this consultation

[Please respond to this consultation](#) by 5pm on 16 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 \(2014\)](#)⁶ and [former Waveney area SCI \(2014\)](#)⁷),
- [Great Yarmouth Borough Council SCI \(2020\)](#)⁸,
- [North Norfolk District Council SCI \(2016\)](#)⁹, and
- [The Broads Authority SCI \(2020\)](#)¹⁰.

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](#).

⁶ Former Suffolk Coastal area SCI (2014): <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/SCDC-Statement-of-Community-Involvement.pdf>

⁷ 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>

⁸ 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

⁹ North Norfolk District Council SCI (2016): <https://www.north-norfolk.gov.uk/media/2823/statement-of-community-involvement-january-2016.pdf>

¹⁰ The Broads Authority SCI (2020): https://www.broads-authority.gov.uk/_data/assets/pdf_file/0024/209337/Final-2020-SCI-31-Jan-2020.pdf

8 Appendix 1

Norfolk and Suffolk Coastal Authorities Statement of Common Ground Coastal Zone Planning

This statement of common ground is between:

- Borough Council of King's Lynn & West Norfolk
- North Norfolk District Council
- Great Yarmouth Borough Council
- Suffolk Coastal District Council
- Waveney District Council
- The Broads Authority

The purpose of this statement is to set out an agreed approach to coastal planning in relation to:

- Demonstrating compliance with the "Duty to Cooperate";
- Agreeing shared aims for the management of the coast;
- Maintaining and develop a shared evidence base; and
- Recognising the importance of cross-boundary issues in relation to coastal management.

Background

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 planning.

A strategic approach to coastal land use and marine planning can benefit from the sharing of both issues and solutions, and inform planning practice. This is particularly the case in light of the similarity and commonality of coastal issues across the signatory planning authorities, the planning duty to cooperate, and the opportunity to build on the benefits of the existing joint Coastal Authority approach such as Coastal Partnership East.

The National Planning Policy Framework (NPPF) states that in coastal areas, local planning authorities should apply Integrated Coastal Zone Management (ICZM) across Local Authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes.

ICZM is a process which requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The recognised key principles which should guide all partners in implementing an integrated approach to the management of coastal areas are:

- A long term view
- A broad holistic approach
- Adaptive management
- Working with natural processes
- Supporting and involving all relevant administrative bodies
- Using a combination of instruments
- Participatory planning
- Reflecting local characteristics



Within the development planning system, local planning authorities should reduce risk from coastal change by; avoiding inappropriate development in vulnerable areas or adding to the impact of physical changes to the coast, as set out in the NPPF. Any area likely to be affected by physical changes to the coast should be identified as a Coastal Change Management Area.

The Flood and Coastal Change Planning Practice Guidance also identifies that land can be formally allocated through local plans for the relocation of both development and habitat affected by coastal change.

Note: Physical change to the coast can be (but is not limited to) erosion, coastal land slip, permanent inundation or coastal accretion.

Shared Aims

- A holistic and “whole coast” approach will be taken, recognising coastal change is an inevitable part of a dynamic coast. A naturally functioning coastline is desirable in principle, but may not be appropriate in every location.
- The signatory Authorities will consider the value of **aligning policy approaches**.
- To have regard to the well-being of communities affected by coastal change and minimise blight.
- To protect the coastal environment, including nature conservation designations and biodiversity.
- To work with local businesses and the wider economy to maximise productive use of properties and facilities for as long as they can be safely and practicably utilised to promote **investment, viability and vitality** of the area.
- Adopt a balanced risk-based approach towards new development in Coastal Change Management Areas, in order to not increase risk, while at the same time to facilitating affected communities’ adaption to coastal change.
- To promote **innovative approaches** such as techniques that enable anticipatory coastal adaptation, removal of affected structures and property roll-back or relocation.

Agreed Approach

The signatory authorities agree to work together on coastal planning issues to:

- a) Implement the principles of Integrated Coastal Zone Management;
- b) Develop shared **understanding** of coastal processes and the development planning implications of these;
- c) Share experience, **best practice** (including planning policies) and ideas for innovation;
- d) Use the adopted **Shoreline Management Plans** as a basis for development planning, recognising that defined areas may change in future and giving appropriate regard to emerging replacement Shoreline Management Plans, updated predictions of the impact of climate change or other relevant evidence;
- e) Acknowledge the importance of coastal communities and their economies, and foster their resilience, innovation and vitality;
- f) Recognise the need to relocate or **protect infrastructure** likely to be adversely affected by coastal change;
- g) Note the need for strategic policies on coastal change, in order to guide **neighbourhood planning**.
- h) Encourage development which is consistent with anticipated coastal change and its management, and facilitates **adaptation** by affected communities and industries.



- i) Consider adopting policies to facilitate rollback and/or relocation, potentially including local plan site allocations or facilitating 'enabling' development;
- j) Consider adopting policies which require the use of risk assessments to demonstrate that a development on the coast will be safe for its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; and
- k) Consider adopting policies that seek to ensure that new or replacement coast protection schemes are consistent with the relevant Shoreline Management Plan and minimise adverse impact on the environment or elsewhere on the coast.

This Statement of Common Ground has been endorsed by the following:



Cllr. Ian Devereux
Cabinet member for Environment
Borough Council of Kings Lynn and West Norfolk



Cllr. Richard Blunt
Cabinet member for Development
Borough Council of Kings Lynn and West Norfolk



Cllr. Hilary Cox
Cabinet member for Coastal Management
North Norfolk District Council



Cllr. Susan Arnold
Cabinet member for Planning
North Norfolk District Council



Cllr. Carl Smith
Chairman, Environment Committee
Great Yarmouth Borough Council



Cllr. Graham Plant
Leader and Chair, Policy & Resource Committee
Great Yarmouth Borough Council





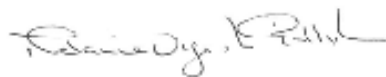
Cllr. Andy Smith
Cabinet member for Coastal Management
Suffolk Coastal District Council



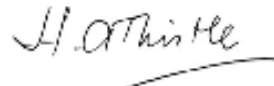
Cllr. Tony Fryatt
Cabinet member for Planning
Suffolk Coastal District Council



Cllr. David Ritchie
Cabinet member for Planning and Coastal Management
Waveney District Council



Melanie Vigo di Gallidoro
Chairman, Planning Committee
Broads Authority



Haydn Thirtle
Chair, Broads Authority



Endorsed by the Environment Agency
Mark Johnson, Regional Coastal Manager

