

Draft Policy LP14 – Coastal Areas

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542884940989#section-s1542884940989>

Consideration of issues:

The main issues raised by consultees were:

- The Environment Agency commented that even the retention of the defences would not provide justification for the relaxation of the policy. Improvement of the defences would still place the new development reliant on the existing defences. In this respect they sought the deletion from 2d of “or promote the retention and/or improvement of local sea defences.” They also suggested that a definition of ‘high risk’ would be beneficial. This could be by reference to Flood Zone 3, areas shown to flood to a certain depth in the THM, etc. These changes are recommended to be accepted.
- Historic England welcomed 1 b but suggest changing ‘protecting’ to ‘conserving’ and changing ‘archaeological’ to ‘heritage’ assets in line with NPPF terminology. These changes are recommended to be accepted.
- Natural England suggested the rewording of Policy LP14, section 2a to read as follows: “promoting visitor access in coastal areas of the borough, whilst taking necessary measures to meet the requirements of the Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate.”
- How issues around the impact of sea level rise on coastal areas are dealt with.
- Holme Parish Council suggest including some examples to clarify the point about visitor promotion versus restrictions on development.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) **Remove the wording from 2d "or promote the retention and/or improvement of local sea defences."**
- 2) **Include in 6.3.1 a definition of 'high risk' and clarification of the minimum that any mitigation measures must achieve and reflect this in the flood risk policy LP22.**
- 3) **In 1 b change 'protecting' to 'conserving' and change 'archaeological' to 'heritage' assets**
- 4) **Reword 2a to read: "promoting visitor access in coastal areas of the borough, whilst taking necessary measures to meet the requirements of the Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate."**
- 5) **Include some examples of the approaches to visitor promotion versus restrictions on development referred to in 2a/b and 2d.**

Policy Recommendation:

LP14 Coastal Areas

Development in Coastal Areas

The Council will seek to balance the sensitive nature of the coastal area of West Norfolk for wildlife, landscape and heritage and the national and international designations including the Area of Outstanding Natural Beauty, and the effects of climate change, with the need for economic and social development of the area.

In this context the Council will:

1. Ensure protection through:
 - a. working in partnership with organisations such as Natural England and the Norfolk Coast Partnership and other conservation bodies to ensure that protected species and habitats on the coast are adequately protected;

- b. ~~protecting~~ **conserving** and enhancing the historic environment qualities of the coast including designated and undesignated **archaeological heritage** assets;
 - c. working with partners including the Environment Agency and local communities to limit any detrimental impacts of coastal change and take account and implement the policies of the Shoreline Management Plans;
 - d. where appropriate, ensuring mitigation or compensation measures are put in place where management strategies change or coastal habitats and the species using them may change in light of changes in climate;
2. Address new development by:
- a. promoting visitor access in coastal areas of the borough, whilst ~~considering any taking~~ necessary measures to meet the requirements of the Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate;
 - b. support and develop services which attract visitors throughout the year and provide for the local community to increase economic sustainability for businesses and services;
 - c. ensuring that any development on the coast is sustainable and able to withstand the effects of climate change;
 - d. resisting new and replacement dwellings and the extensive alteration of dwellings and relaxation of occupancy limitations unless the Shoreline Management Plans acknowledge the absence of risk **or promote the retention and/or improvement of local sea defences**;
 - e. ensuring that any new development enhances the distinctive local character of coastal areas as well as helping to support and enhance services and facilities for local people and visitors alike; supporting the recommendations of the AONB Management Plan and continuing to play a role as a key partner in the Norfolk Coast Partnership;
 - f. using the Green Infrastructure Strategy and the Green Infrastructure Mapping to identify possible areas for biodiversity enhancement on the coast (**The Wash** and North Coast) and deliver this through decisions on planning applications and partnership working.

Policy LP14 contributes to Strategic Objectives 2, 5, Economy; 7, 8, 9 Society; 11, 12, 13, 14, 15 Environment; 32, 33, 34 Coast.

Supporting text:

LP14 Development in Coastal Areas (previously CS07)

Introduction

6.1.1 The impact of flooding and climate change threatens the distinctive villages, landscape and heritage of the area. In adapting to flooding and climate change, the strategy will promote new and innovative approaches to mitigate risk which do not undermine existing coastal assets. The Sustainability Appraisal has highlighted that some land may in time be lost to the sea, therefore it is important that mitigation strategies are developed for threatened sites that may be designated of special importance, historic interest or particular landscape character.

6.1.2 Existing Shoreline Management Plans (SMPs) for the Coast (The Wash and North Norfolk SMPs) plan for the impacts of changes in Shoreline Management over the next 100 years. These were led by the Environment Agency in consultation with the borough council. Methods of management include holding the line and improving and safeguarding defences, managed alignment whereby there is defence, although it may mean the loss or gain of some land and, lastly, managed retreat where areas may be lost to the sea. All of these options will be considered through statutory organisations and public consultation with benefits and risks appropriately weighed.

6.1.3 To ensure that people and their homes are protected from flooding, new development will need to be carefully considered. Therefore, where the Shoreline Management Plans and Strategic Flood Risk Assessments highlight an area at high risk of flooding on the coast with no possible mitigation, development will be resisted for safety reasons. **High risk refers to areas in Flood Zone 3 and areas shown to flood to a certain depth in the Tidal Hazard Mapping.**

6.1.4 Whilst development and investment is needed in the coastal areas of the borough, it is important that growth is sustainable, well planned and can demonstrate use of sustainable building methods in locations with good access to services and facilities which serve local communities well.

6.1.5 The Wash East Coastal Management Strategy (WECMS) (2015) was prepared with the Environment Agency to identify the preferred strategic coastal management approach for the frontage between Hunstanton and Wolferton Creek, on the Norfolk coast of The Wash. The Strategy implements the policies of **the** The Wash SMP (2010).

6.1.6 The strategy splits the coastline into three distinct areas:

- unit A - Hunstanton Cliffs
- unit B - Hunstanton Town
- unit C - South Hunstanton to Wolferton Creek

6.1.7 In Unit C a funding approach to maintain the sea defences through recycling and recharge of beach material has been developed (see Policy LP15 Coastal Change Management Area for more detail). A Coastal Management Plan (CMP) is being prepared for Hunstanton, setting out a more detailed management approach for Units A and B.

6.1.8 A Coastal Zone Planning Statement of Common Ground has been agreed (2018) between the Norfolk and Suffolk coastal local planning authorities 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 developing a shared evidence base; and
- Recognising the importance of cross-boundary issues in relation to coastal management.

Policy LP14 Development in Coastal Areas - East Marine Plans Supporting Policies:

[SOC1](#): Proposals that provide health and social wellbeing benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.

[SOC2](#): Proposals that may affect heritage assets should demonstrate, in order of preference:

- that they will not compromise or harm elements which contribute to the significance of the heritage asset;
- how, if there is compromise or harm to a heritage asset, this will be minimised;
- how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against;
- the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate harm to the heritage asset;

[TR3](#): Proposals that deliver sustainable tourism and/or recreation related benefits in communities adjacent to the East Marine Plan areas should be supported.

[CC1](#): Proposals should demonstrate that they have taken account of how they may:

- be impacted upon by, and respond to, climate change over their lifetime
- impact upon any climate change adaptation measures elsewhere during their lifetime

- Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.

BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including habitats and species that are protected or conservation concern in the East Marine Plan and adjacent areas (marine, terrestrial).

BIO2: Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests

Sustainability Appraisal:

LP14 Coastal Areas Policy

The changes to the policy recommended have no material impact on the scoring – it remains as having a strong likely positive effect.

LP14: Coastal Areas Policy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP14	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	-2	Likely Positive Effect +14
Draft LP14	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	-2	Likely Positive Effect +14
No Policy	-	+/-	+/-	+/-	+/-	+/-	-	+/-	+/-	0	-	0	0	0	0	+	+	0	+	+	+11	-10	Likely Mixed Effect +1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Norfolk Coast Partnership (AONB)	Comment	<ul style="list-style-type: none"> BIO2: 'Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interest'. 	'Where appropriate' sounds a little vague, please consider earlier comment about Biodiversity Net Gain.	Disagree BIO2 is merely quoting one of the Marine Plans supporting policies, which is not ours to change.
Mr Paul Blay	Object	1. Coastal and Low-lying areas - impact of rising sea levels. Most important, the draft pays little attention to the differential impact on parts of the Borough of the accelerating rise in sea levels now taking place. Sea levels are expected to rise significantly during the Plan period: potentially, by a metre or more over the next 80 years. Changes of this magnitude will alter dramatically the use, both existing and potential, that can be made of many coastal and other low-lying areas. Changes of this magnitude will be a major factor for the future of North-West Norfolk. The draft needs to give serious attention to the resulting major changes that are likely.	The draft needs to give serious attention to the resulting major changes that are likely.	A Climate Change policy will be included in the Plan.
Planning Advisor Environment Agency	Object	Bullet point 2d: Even the retention of the defences would not provide justification for the relaxation of the policy. Improvement of the defences would still place the new development reliant on the existing defences. We do not recommend the inclusion of "or promote the retention and/or improvement of local sea defences."	Remove the wording "or promote the retention and/or improvement of local sea defences."	Agree remove wording as requested by Environment Agency.
Planning Advisor Environment Agency	Object	6.1.3 - A definition of 'high risk' would be beneficial. This could be reference to Flood Zone 3, areas shown to flood to a certain depth in the THM etc.	Some clarification of what the minimum that any mitigation measures must achieve would be beneficial. The statement is a	Agree include a definition of 'high risk' and clarification of the minimum that any mitigation measures must achieve and reflect this in

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			sequential/exception test position and should be reflected in the flood risk policy.	the flood risk policy LP22.
Historic Environment Planning Adviser, East of England Historic England	Mixed	Object - Welcome 1 b but change 'protecting' to 'conserving' and change 'archaeological' to 'heritage' assets in line with NPPF terminology. Welcome reference to local character of coastal areas in 2e.	Change 'protecting' to 'conserving' and change 'archaeological' to 'heritage'.	Agree make changes as recommended by Historic England. Support is noted and welcomed.
Norfolk Coast Partnership (AONB)	Support	Support policy LP14 Coastal Areas.		Support is noted and welcomed.
Parish Clerk Holme-Next-The-Sea Parish Council	Object	With respect to the effects of climate change it is unclear how protection (and exposure to risk?) will be balanced against the need for economic and social development. The approach to 2a and 2b (promoting visitor access) seems inconsistent with that in 2d (resisting new and replacement dwellings). Some examples might help.		Agree include some examples of the 2 approaches referred to in 2a/b and 2d.
Consultations Team Natural England	Mixed	Natural England are supportive of Policy LP14 and the specific requirements to ensure protection of the natural environment, landscape and biodiversity in accordance with the AONB Management Plan, East Marine Plan and Shoreline Management Plan,	We suggest the rewording of Policy LP14, section 2a to read as follows: "promoting visitor access in coastal areas of the borough, whilst taking necessary measures to meet the requirements of the	Agree amend the wording of 2a as suggested by Natural England.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate.”</p> <p>We welcome the use of Green Infrastructure Mapping to identify and deliver biodiversity enhancement on the coast.</p>	<p>Support is noted and welcomed.</p>