

Reconciling Regeneration and Coastal Adaptation

A report commissioned as part of the
East of England Coastal Initiative

Accompanying volume to the final report: Local policy
reviews

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SQW

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1: Policy Framework: Clacton, Jaywick, Brightlingsea and West Mersea

- 1.1 This section provides an overview of land use planning and development policies, sustainable community strategies and flood risk, coastal defence and shoreline management policies for the four settlements of Clacton, Jaywick, Brightlingsea and West Mersea.
- 1.2 In each case, we summarise the current adopted planning framework and any new plans which are currently at ‘consultation’ stage, focusing on specific regeneration proposals. Similarly we record relevant flood risk assessments and both the current shoreline management policies and proposals for the future. Potential synergies and conflicts between development plans and coastal defence plans are identified with a discussion of the practicalities of resolution.

Status of key elements of the policy framework

Land-use planning policies

- 1.3 West Mersea is part of Colchester Borough and Clacton, Jaywick and Brightlingsea are all part of Tendring District. The current operational land use plan for Colchester is the adopted Core Strategy (December 2008). The Tendring District Local Plan lists current policies for the other three settlements. This was prepared in 2007 as an interim measure whilst work to implement the new Local Development Framework (LDF) got underway. The Plan was adopted in 2008 and has a limited ‘shelf life’, running to 2011 when it should be replaced by a Core Strategy under the LDF system. The draft Core Strategy & Development Policies have recently been the subject of public consultation, (opened on 21st October 2010 for 6 weeks). This indicates the broad vision and objectives for settlements but does not specify all detailed land uses. A ‘Site Specific’ Development Plan Document (DPD) will follow, but has not as yet been published for consultation.
- 1.4 An ‘Interim Planning Policy for Jaywick’ was approved by Tendring Council’s Cabinet on 15th December 2010. It was subsequently rescinded on the 6th January 2011 after protest by residents and challenge from local councillors.

Sustainable Community Strategies¹

- 1.5 Sustainable Community Strategies (SCS) are produced by Local Strategic Partnerships (LSP)². ‘Tendring Together’ has a horizon of 2016 and includes a ‘vision’ of how the district might look then. It is based on six strategic themes of health, economic development, children & young people, crime & disorder, deprivation and environment. ‘Colchester 2020’ was

¹ Note that the *Best Value: New Statutory Guidance Consultation* (published in April 2011 by CLG) highlights the plan to repeal the Duty to Prepare a Sustainable Community Strategy

² The LSP is made up of representatives from many organisations, including local government, voluntary and community sectors, faith groups, local businesses and agencies delivering public services locally, such as the police and NHS.

published in 2009 and consists of both a strategy and detailed action plan. The strategy's five priorities are concerned with promoting business & employment, reducing traffic congestion, improving Colchester as a visitor destination, promoting healthy lifestyles with quality, affordable housing and creating strong, safe communities.

Flood risk, coastal defence & shoreline management plans

- 1.6 The policies relating to flood risk and related shore management have not been developed solely on a 'District Council' basis as plans for river catchments, estuaries and coasts are shared across a number of different agencies, known as 'operating authorities'.³

Flood risk

- 1.7 Strategic Flood Risk Assessments (SFRAs), are required for all development areas put forward for inclusion in Core Strategies under the LDF process and have been commissioned by District Councils. Tendring DC commissioned a district-wide study as well as a separate Flood Risk Study for Jaywick⁴. Colchester BC commissioned a study jointly with Braintree and Chelmsford Councils which reported in 2006⁵. This covers West Mersea.

Coastal defence

- 1.8 The government has published policy aims and objectives for flood and coastal defence since the 1990s, with occasional updates. Defra and the Environment Agency are currently developing "A National Flood and Coastal Erosion Risk Management Strategy for England". All coastal defence 'operating authorities' are required to produce a policy statement setting out their plans for delivery at a local level. Tendring DC as 'operating authority' is responsible for 18.5k of coast defences out of 60k total coastal frontage in the district, with the remainder managed by the Environment Agency. The Council's responsibilities cover 1.18k at Brightlingsea and 5.92k at Clacton with Holland. TDC published its 'Policy Statement on Flood & Coastal Protection' in May 2010. This quoted the government's policy aim as follows:

To reduce the risk to people and the developed and natural environment from flooding and coastal erosion by encouraging the provision of technically, environmentally and economically sound and sustainable defence measures.

- 1.9 TDC has spelt out details of its plans for reducing or managing the risk of flooding and coastal erosion risk in the Council's area. These include specific reference to the provision of sustainable coastal defences which 'provide social and/or economic benefits to people whilst taking account of natural processes and which avoid committing future generations to inappropriate defence options'. The Council is also committed to discouraging inappropriate development in areas at risk of flooding and coastal erosion.

³ The operating authorities are the Environment Agency, local authorities and internal drainage boards

⁴ Jaywick Flood Risk Study, May 2008, produced by JBA Consulting; Tendring District Council Strategic Flood Risk Assessment, March 2009, produced by JBA Consulting; both commissioned by Tendring DC

⁵ Mid Essex Area Liaison Group – Strategic Flood Risk Assessment, produced by Scott Wilson, 2006 (Colchester BC, Braintree DC, Chelmsford BC)

Shoreline management

- 1.10 The current Essex Shoreline Management Plan (SMP) dates from 1997 and is solely concerned with coastal and tidal estuary defences; separate management plans cover upstream estuaries and river catchments⁶. It was part of a set of SMPs which covered the entire coastline of England and Wales. The coverage and planning horizons of future SMPs are being extended. They include both coastal and estuarine defences and now look up to 100 years ahead, broken down into 3 ‘epochs’. A draft Essex and South Suffolk SMP (ESSSMP) was circulated for public consultation in March 2010 and is currently undergoing finalisation⁷. In this, the ‘short-term’ epoch is up to 2025, the ‘medium-term’ runs from 2026 to 2055 and the ‘long-term’ runs from 2056 to 2105. For each period the ‘headline’ approach to management is one of 3 options (i) “*hold the line*” (or ‘advance the line’, with new defences out to sea) (ii) “*managed realignment*” and (iii) “*no active intervention*” – basically, letting nature take its course.

Case Study Settlements

Clacton

History of Clacton

- 1.11 Clacton-on-Sea is the largest town in Tendring district, with a population of just over 54,000 in 2008. It developed as a popular tourist resort in the 1950s through to the 1970s. Although still visited by many tourists, especially in summer, it has experienced decline. It has a low employment rate and was ranked in the 2007 Index of Multiple Deprivation (IMD) as relatively deprived. The town centre is dominated by traffic and the quality of the ‘public realm’ is considered poor.
- 1.12 The town is situated on high ground but the beach at Clacton is being steadily eroded. This results from a near-shore sediment divide. To the south of the town, sediment moves along the shoreline to the southwest to accrue at Colne Point. To the north of Clacton the sediment drift is generally northwards. Here it meets the southerly drift of sediment from the north, resulting in accrual at the Naze, north of Walton.
- 1.13 The Environment Agency states that the long-term maintenance of coastal defences at Clacton will be very challenging, with costs increasing significantly as the sea level rises and erosion becomes more severe.

⁶ Essex Shoreline Management Plan, April 1997, produced by Mouchel Associates Ltd; commissioned by Tendring DC, Maldon DC, Rochford DC, Southend-on-Sea BC and the Environment Agency

⁷ Draft Essex and South Suffolk Shoreline Management Plan, prepared by the Environment Agency and circulated for consultation in March 2010. At the time of writing a final Essex and South Suffolk Shoreline Management Plan had been agreed by all partner organisations but was still subject to Secretary of State approval. Where policy has changed from the draft ESSSMP used as the basis for analysis in this report and those changes are in the public domain they have been noted in footnotes

Policy framework for Clacton

Local Plan / Local Development Framework (and related statements)

- 1.14 Chapter 8 of the **Tendring District Local Plan** (2008) relates to planning issues at Clacton-on-Sea, (including Jaywick and Holland-on-Sea). The town is the main employment centre and policies are geared to ensuring there is adequate land for future development, including extensions to industrial estates, business parks and provision for offices. Regeneration is a critical issue and a Town Centre Strategy was adopted in 2003 which seeks to widen job opportunities through the encouragement of office development and strengthening the role of Clacton as a shopping centre and visitor attraction.
- 1.15 Leisure and tourism are highlighted as vital aspects of the Clacton economy. Although long-stay holidays have decreased, holiday trends show an increase in short breaks and day visitors. Previously, Clacton was identified as a “*Priority Area for Coastal Tourism*” in Policy LRT11 of the Essex Replacement Structure Plan; protecting and upgrading tourism and leisure facilities were seen as critical because they contribute to economic regeneration. Within the Tendring District Local Plan, the main tourist facilities are listed as “*the beaches, the Pier, seafront gardens and amusements*”, together with hotels, guesthouses, caravan and chalet parks. The redevelopment or renovation of Clacton Pavilion for leisure purposes is proposed in Policy CL2; planning permission was granted in 2003 for refurbishment together with a new promenade and facilities.
- 1.16 The Tendring District Local Plan outlines specific measures to be taken under the heading “*Defending the Coastline*” to replace the coastal defences at Clacton and Holland; the intention is to improve the quality and stability of Clacton’s beaches and promenades. The narrative refers to on-going erosion to the coast and beaches “*undermining the strength and condition of the sea walls and promenades*”. A scheme has been proposed to build 13 offshore breakwaters across the Clacton frontage and to recharge the beaches with imported sand against the sea wall. Together, the breakwaters and beaches will absorb wave energy and so prevent the sea wall from being undermined; similar work has successfully been carried out on the Jaywick coast. Existing timber groynes and concrete breakwaters will be removed and the new beach levels will be higher, “*creating large expanses of open sandy beach at all states of the tide*”. There could even be opportunities for sheltered summer moorings or launching facilities.
- 1.17 At the time the Plan was written (in 2007), Phase 1 had been started at Holland on Sea where the beaches are particularly low. Later phases were considered less urgent (to be carried out over a 20 year period).
- 1.18 Other policies which are designed to improve the tourism ‘offer’ include CL3, covering the enhancement of facilities such as kiosks on the seafront and CL4, encouraging leisure and related development in Martello Bay on undeveloped land. Existing caravan and chalet parks, hotels and guesthouses are to be safeguarded, with appropriate improvements to facilities and some expansion. The areas where amusement centres are permitted will be restricted, (policy CL5).

1.19 A number of other Clacton-specific policies are listed, including retailing, food and drink, mixed-use developments, housing, healthcare, recreation land, pedestrian priority, traffic management, conservation areas and the historic Seafront Gardens.

1.20 **Tendring District Council draft Core Strategy & Development Documents (2010)** provides the 2031 vision for Clacton⁸:

Clacton-on-Sea will have seen the largest proportion of the district's growth in new housing and commercial development and there will be visible signs of regeneration in the town centre and along the seafront.

Clacton will be well-known as a re-invented '21st Century year-round resort' offering a mix of contemporary and traditional family leisure activities in its core seafront visitor area with a vibrant evening economy and conference opportunities.

The town will be a popular place on the coast to live and work for people of all ages having been the focus for well planned major growth in new quality housing, jobs and other community services and attractive surrounding countryside.

As a shopping centre, it will have undergone a renaissance, boasting quality new development and retailers giving the area a fresh, vibrant image attractive to increasing numbers of new visitors as well as residents'.

1.21 Six objectives are listed to deliver this vision:

- promoting the town as a '21st Century' year-round resort
- protecting and enhancing the town's core visitor area on the sea front
- delivering major economic growth in the town centre
- delivering significant amounts of new market and affordable housing
- delivering a comprehensive package of green infrastructure
- providing a new relief road to ease the town's traffic pressures.

1.22 Following on from the current Local Plan, the draft Core Strategy records that there are a number of areas in Tendring which require improvements to the quality of life, the economy and the physical environment. These 'regeneration areas' will be 'the focus for investment in social, economic and physical infrastructure and initiatives'. Core Policy 12 identifies regeneration areas for 'Clacton Town Centre & Seafront' and 'West Clacton' which provide for the economic regeneration of the town and future housing requirements with West Clacton additionally expected to provide for the relocation of residents in parts of Jaywick.

Sustainable Community Strategy

1.23 **Tendring Together – the Sustainable Community Strategy 2007 (SCS)** summarises the vision for Tendring as follows:

⁸ See Draft Core Strategy: Section 6: Spatial Vision and Objectives 6.2, 6.8, 6.9

By 2016 Tendring will have a thriving and prosperous economy. All our residents will be able to access a safe and healthy quality of life in an attractive environment. Each of our communities will offer a range of new housing and other important services and facilities and children and young people will have the opportunity to have a good start in life.

- 1.24 Specific objectives for Clacton include completion of the town centre environmental enhancements, with a new pedestrian shopping mall attracting additional national retailers. The town will have been promoted and marketed as a holiday destination and as an attractive place to live; more people will seek to relocate to enjoy new leisure opportunities. Visitors will be attracted by new hotels, conference and other facilities as well as the provision of new 'offshore barrages' sea defences and promenade development. Deprivation in Clacton will be tackled through a range of measures, including tailoring mainstream public service activities to support deprived areas through neighbourhood management, environmental enhancement and capital investment, upskilling the workforce, improving education outcomes and improving housing. More people will consider that they can influence decisions and access services. The district's leisure and tourism 'offer' (including attractive resorts and marine heritage) will be improved, attracting more visitors and creating jobs.
- 1.25 Safeguarding the district's attractive environment is a particular issue and an important objective is to address climate change at a local level, with particular reference to coastal and inland flood protection.
- 1.26 Annual theme delivery plans are proposed, starting in 2007/08, set within the context of a three year rolling plans. They will include annual targets, establishing who will do what, by when and with what resources.

Strategic Flood Risk Assessment

- 1.27 The Tendring District **Strategic Flood Risk Assessment** published in May 2009, states that 'Clacton-on-Sea frontage is high ground, seawalls begin southwest of the pier and comprise substantial concrete parapet walls on block armoured clay banks built to 5.0m AOD⁹.'
- 1.28 The study simulated a number of breaches in coastal defences and the implications for areas of potential development identified in the draft Core Strategy. Clacton and Holland-on-Sea are considered in terms of the consequences of a breach at Holland Point:

A failure in the sea wall at the Holland Brook outfall would potentially flood a very wide area including a small part of the area of search near the Picklers ditch. The flood depths are high throughout most of the affected area and hazard to life extreme in the vicinity of the river. The flood extent spreads across the golf course area towards Frinton and skirts the outside of the Frinton as well as Clacton. The effect of climate change is limited although the area affected along the development search increases marginally.

⁹ Above Ordnance Datum - above average sea level

Shoreline Management Plan

- 1.29 Clacton-on-Sea is part of Coastal Unit 7 within the **Essex SMP (1997)**, which runs from Colne Point to Walton-on-the-Naze. The town itself is covered by Unit 7c, West Clacton to Holland Haven. The sea defences on this stretch consist of seawall, recharged beach and fishtailed breakwaters. The defences to the west of the pier were considered to be in good condition. However to the east the condition was described as ‘fair to poor’, although two schemes had recently been completed. Defences between Clacton Pier and Holland were being rendered unstable by lowering beach levels; repairs require substantial capital works.
- 1.30 The SMP identifies a number of primary objectives for the Tendring Peninsula. As well as providing effective defence for people and property against flooding and erosion where economically, technically and environmentally justifiable and sustainable, they include defending the urban and developed frontages at Clacton, supporting the use of Clacton Pier as an important tourist attraction and encouraging tourism and recreation where appropriate when appraising coastal defences on the frontage.
- 1.31 A number of issues are identified for the peninsula as a whole – both problematic and offering opportunities. These include the fact that coastal caravan and chalet sites are presenting development pressures. The importance of a thriving tourist trade for the local economy is recognised as an advantage for Clacton. Provision of facilities for power craft could be incorporated within new sea defence works at Clacton to help alleviate water sports conflicts on the Blackwater and Colne estuaries.
- 1.32 The preferred policy line for Clacton was “*hold the line*”, both in the short term (10 years) and beyond.
- 1.33 Within the new **draft Essex and South Suffolk Shoreline Management Plan (2010)**, Clacton-on-Sea is included within Management Unit C: Tendring Peninsula, Policy Development Zone C3. The policy proposed for all three epochs through to 2105 is to “*hold the line*”. However, it is planned to develop a strategy specifically for Clacton and Holland Haven (starting in 2010) where policies for the town will be formulated in more detail. As a ‘larger settlement’, Clacton-on-Sea can anticipate the maintenance or upgrading of the standard of protection, taking account of climate change.

Responses to regeneration and adaptation in Clacton

- 1.34 Clacton has long been a regional and county focus for regeneration and in recent years, it has benefited from funding from EEDA and the HCA and other national funds. The regeneration projects for Clacton have been set out within Haven Gateway’s overall framework for growth and Integrated Development Plan (IDP) and InTend’s Delivery Plan. Amongst some of the **key physical and economic regeneration** projects supported have been:
- the *Clacton Regeneration Project* (Pier Ward) which focused on the seafront area of Clacton and included and upgrade and harmonising the streetscape in Pier Avenue with adjacent areas of the town, restricting traffic in the day to prioritise pedestrians, and connecting the town centre to the seafront with the Marine Parade/Pier Avenue/Pier Gap Gateway. The project was funded by the Haven Gateway Partnership

- the *Pier Gap Gateway* is part of continued activity on the Seafront and design work was launched in Summer 2010 as part of the ongoing transformation of the area. Property consultants (Broadway Mayan) and urban designers (Wayne and Geradine Hemmingway) were commissioned to develop proposals to the Pier Gap Gateway which will provide better links between the town, the pier, and the beach. Their report was submitted to the Council in August 2010 and will be used to inform the preparation of the Clacton Town Centre and Seafront Action Plan (CAAP). InTend are already investigating how some of the proposals can be implemented
- a network of *green corridors* to create a greenway around the eastern and northern fringes of Clacton, potentially extending along the whole coast of the Tendring peninsula – including Jaywick and Brightlingsea – were proposed to address the relative lack of natural green space in Clacton other than provided by the beach. These projects were proposed by the Haven Gateway partnership but have not progressed to delivery
- *Clacton Seafront and Marine Gardens* involving replanting, restoration and improved access for the Victorian gardens that were originally opened along with the pier. Significant investment was funded by the Heritage Lottery ‘Parklife’ programme in 2003.

1.35 The continuation of these themes and priorities is evident in the ten ‘key projects’ are identified for Clacton in the draft core strategy (2010). Together they will help provide 4,100 new homes and 3,500 new jobs between 2011 and 2031¹⁰. However, the projects which are particularly relevant to regeneration and are located in or adjacent to the coast include Project 1: Rejuvenating Clacton Seafront; Project 2: Economic growth in Clacton Town centre; Project 4: St Johns Relief Road; Project 7: West Clacton Outdoor Leisure Park and Project 8: Martello Bay Watersports area. These are discussed below.

Box 1-1: Clacton’s key regeneration projects

Project 1: Rejuvenating Clacton seafront

The seafront is considered to be Clacton’s most important asset. During 2010 a strategy was prepared by a consortium involving local businesses, residents, specialist consultants and TDC which is designed to rejuvenate the seafront, especially the area around the Pier. Seven key elements are listed:

- refurbishing and improving the indoor and outdoor leisure attractions and facilities around Pier Gap (including the Pier itself, the Pavilion and the Atlanta Café), encouraging the use of underused buildings, introducing new attractions and business opportunities and maximising the attraction of the Gunfleet Sands off-shore wind farm for educational and tourism purposes
- enhancing and better utilising the greensward, cliffs, promenades, seafront gardens and beach huts and improving their accessibility and attractiveness
- introducing new public realm and lighting schemes along the seafront aimed at encouraging increased and safe use of the area both at day time and at night
- implementing the Essex and South Suffolk Shoreline Management Plan in protecting the town from the sea, by replenishing beaches and minimising the further loss of important beaches to coastal erosion, particularly at the eastern end of the seafront at Holland-on-Sea

¹⁰ See draft Core Strategy Sections 7, 10

- making adequate provision for important on-street and off-street coach and car parking along the seafront, along with suitable proposals for new hotels with conference facilities; and
- improving visitor information points, signage and the quality of pedestrian links between the station, town centre and seafront; and
- promoting Martello Bay as a 'Water Sports Zone' (see Project 8).

The draft Core Strategy states that the main proposals will be included in the Clacton Town Centre and Seafront Action Plan (CAAP). The proposals appear to imply that the detailed coastal defence and beach re-charging measures spelt out in the Local Plan will go ahead, although they are not specifically listed as 'essential infrastructure improvements' either here or in Spatial Strategy 5¹¹ and revised proposals are still in development after funding was not available for the current proposals.

Project 1 lists a number of elements as essential 'requirements' for its success; these include 'implementing the Essex and South Suffolk Shoreline Management Plan'. Central government is identified as the funding body, through the Environment Agency.

Project 2: Economic Growth in Clacton Town Centre

Jobs growth in the retail and office sectors is considered to be the primary ingredient of this policy. The town's population growth through new housing will increase retail demand; an improved retail offer will also 'claw back' Clacton residents who now travel to Colchester to shop. Investment in the seafront, as detailed in Project 1, will generate additional jobs in tourism. Key 'public realm' environmental and transport improvements will be spelt out in the CAAP, looking forward to 2031.

Project 4: St John's Relief Road

The relief road is considered critical to reducing 'high season' traffic pressures on the town and providing an alternative 'tourist route' to the seafront and town centre. It will also provide a more attractive, direct route to Jaywick.

Project 7: West Clacton Outdoor Leisure Park

Proposals for a leisure park relate to a wedge of open countryside between West Clacton and Jaywick. The area already includes golf clubs, football and aero clubs. The site will be safeguarded and promoted as an outdoor leisure park, building on existing uses and improving access to the countryside for walking, cycling and horse-riding. It will also be available as a seasonal park-and-ride facility.

Project 8: Martello Bay Watersports Area

The sands at Martello Bay are described as being one of the most popular stretches of Clacton beach – a status enhanced in recent years due to major sea defence works. Over the years the concept of promoting the area as a watersports centre has evolved, building on facilities including a restaurant, parking, coastguard station, lifeboat house and launching ramp. There is undeveloped land available for water-based commercial, leisure and tourism activities. The provision of St Johns Relief Road would make the Bay more accessible.

1.36 In terms of **sea defence and adaptation** projects, the detailed proposals set out in the current Local Plan – for 13 offshore breakwaters and recharging and raising the beaches to replace existing sea defences at Clacton-on-Sea and Holland-on-Sea – were submitted to Defra in 2004 and although they were given approval in principle, the scheme did not receive funding approval. Tendring District Council is now working with the Environment Agency to develop revised strategy proposals and this work is expected to be completed in 2012. In the meantime, works are ongoing to carry out short-term repair as required. These have included three sites in Holland-on-Sea where the eroding sea wall has been replaced with a new concrete stepped defence to break down the wave action and reduce erosion. As well as

¹¹ Roger Tym & Partners were commissioned by TDC to carry out an 'Infrastructure Study' to identify existing problems, constraints or spare capacity and investigate the implications of growth in different areas. However, the range of projects considered did not include flood or coastal protection works.

providing defences these new sea walls have enhanced the appearance of the promenades near these popular beach hut locations.

Summary comment and observations on compatibility in Clacton

- 1.37 The current Local Plan spells out detailed coastal defence proposals which are designed to alter the impact of sediment movement on the seafront at Clacton. The sediment currently divides, moving both south and north, with the consequence that the town's beach is being eroded and the seawall undermined. The Local Plan argues that without investment in new breakwaters and imported sand over the ensuing 20 years, Clacton's continuing role as a traditional holiday resort is further threatened. The aim of developing short-stay and day visitor tourism relies heavily on the quality of the town's beach, alongside other facilities.
- 1.38 Tendring District Council's draft Core Strategy appears to adopt a similar line, stating that implementation of the draft ESSSMP will include features such as beach recharging. However, as it stands, the draft ESSSMP is primarily concerned with protecting communities and it is unclear whether the protection of Clacton's seawalls in future will necessitate extensive replenishment of beaches – potentially on a regular basis – and current interim solutions favour concrete stepped defences that are more resilient given the loss of beach material which would otherwise reduce the impact of wave action on the seawalls. Further details of exactly how the “*hold the line*” policies for Clacton will operate have yet to be worked up.
- 1.39 The existing and proposed land-use policies for regenerating Clacton seafront aim to improve the general environment and enhance the quality already evident in the adopted Conservation areas. In the Martello Bay area, a nucleus of watersports facilities could be further developed; the existing Essex SMP reinforces this by considering development of facilities for power boats in the Clacton area to reduce pressures elsewhere. The draft Core Strategy mentions potential for developing conference facilities. But should the beach along the town sea front be further eroded, it is not clear that there are alternative attractions on which to build tourist ‘regeneration’.
- 1.40 The Sustainable Community Strategy outlines comprehensive programmes for regeneration in Clacton but its objectives may well now be stymied by the lack of public funds to support the investment required to achieve significant improvements in housing and the environment. The accompanying programmes for neighbourhood and community development may also be adversely affected by cuts in central government grants to district councils.

Jaywick

History of Jaywick

- 1.41 Jaywick lies immediately to the west of Clacton but is of a very different character. Its resident population is around 5,000. The Jaywick Sands estate was a *plotland* development initially created in 1929 on reclaimed marsh and grazing land by the surveyor Frank Stedman, a motoring enthusiast. The ‘Brooklands Estate’ layout was supposedly based on the design of a Bentley radiator grille and the unadopted roads were named after then-popular motor cars

such as Riley and Morris¹². The estate consisted of large beach huts squeezed onto the site. During the 1930s the resort expanded with more small chalets built on unadopted roads. The original Brooklands, Grasslands and Village areas were developed with plots for chalets as small as 6 metres by 15.2 metres, giving residential densities of between 60 and 100 dwellings per hectare, mainly timber framed and single storey holiday homes. Roads were unadopted and facilities were minimal. After the Second World War, occupancy switched from holiday to primarily permanent privately-owned residential use, despite lacking most facilities of an ordinary village, such as adopted roads, sewerage and street lights. This area lies within an area of high flood risk. The 1953 floods took a harsh toll, with 37 deaths, as the sandy coast was then unprotected.

- 1.42 Significant coastal protection work was carried out after the floods, involving building a counterwall and the construction of groynes and breakwaters. Extensive caravan sites have been developed to the west of the chalet estates. By the late 1960s, there were at least 800 chalets on the Brooklands and Grasslands estates. In 1971, Clacton Council tried to compulsorily purchase and then demolish the worst 770 properties on the chalet estates but there was considerable opposition, with only 90 accepting the compensation offered. Gaps in the streetscape now exist where the Council cleared the plots they purchased. Eventually some basic services such as mains water supply and drainage were provided, but the quality of housing remained poor. An ‘Article 4 Direction¹³’ strictly controls all developments, however minor, in the Brooklands, Grasslands and Village area, requiring planning permission to be gained for even a porch extension.
- 1.43 In the late 1990s, the area was designated a Rural Priority Area. Subsequently, a sea front community centre, an Enterprise Centre and street lighting were provided.
- 1.44 In 1997 plans for 40 new homes were drawn up by the Guinness Trust, to be funded in part by Capital Challenge, a government fund for housing. The intention was to re-house people living in the 40 worst properties on the estate. The vacated sites would either be used for new building to modern standards or left as much-needed open space. In the event all residents refused to leave their homes but the new dwellings are now all occupied by households moving from elsewhere in Jaywick Sands.
- 1.45 The new homes consist of 2 and 3 bedroom houses and 2 bedroom bungalows built around a small square with fruit trees and a nearby wetland nature habitat to deal with storm water. They are constructed of red cedar clad and prefabricated walls and roofs, to fit in with the wooden cladding on many original dwellings. A new adopted road was built, Lotus Way, in 2003. A private developer has also built a block of apartments on the beach front on the site of a demolished club which closed in 1987.
- 1.46 Despite the modest improvements, Jaywick remains a very deprived neighbourhood, as is evidenced by its very low ranking in the 2007 Index of Multiple Deprivation. With high unemployment, low incomes and poor health, alongside poor services and facilities, the area requires significant regeneration. It is estimated that 80% of Brooklands and 50% of

¹² The history is largely based on: Jaywick: Survival, Preservation and Regeneration, from VCH Essex Vol. X1 Texts in Progress (Resorts 1970 to 2009), February 2010, University of London

¹³ Under the Town & Country Planning (General Permitted Development) Order. The Article 4 was imposed in 1978 to protect the amenities of local residents and to control the appearance of the area.

Grasslands properties are privately-rented, with many households relying on their rent being paid by housing benefits.

- 1.47 In the late 1980s, the Environment Agency, which is responsible for maintaining defences on this stretch of coastline, constructed new breakwaters, designed to divert dominant tidal flows away from the beach zone as well as giving wave breaks. This was necessary as the coastline is subject to long-term shore recession; the foreshore is steepening as the low water mark moves landwards. In recent years, the Environment Agency has also provided for beach recharging at Jaywick as well installing additional defences such as a rock breakwater scheme and a new groyne. The investment in coastal defences at Jaywick means that the area is currently defended to a high standard but the cost of these defences raises the question about the sustainability of continued investment of this kind in the long term.

Policy framework for Jaywick

Local Plan / Local Development Framework (and related statements)

- 1.48 The current planning framework for Jaywick is set out in the **Tendring District Council (TDC) Local Plan (adopted 2007)** (see Chapter 8 of the Written Statement), which provides the blueprint for development through to 2011. The aim is to transform Jaywick over time “into an inclusive, safe, sustainable, economically buoyant community taking advantage of its coastal location”.¹⁴
- 1.49 Policy CL 15 covers residential development and details requirements for any new dwellings to be built in the Brooklands, Grasslands and Village estate areas. Policy CL 15a deals with the regeneration of Jaywick and spells out the details of required S106 contributions for improving local services and facilities within Jaywick; Policy CL 16 reinforces strict planning controls on inappropriate activities in residential areas. When considering all applications, the advice of the Environment Agency will be an important material consideration.
- 1.50 The over-riding aim is to reduce the density of dwellings in areas vulnerable to flooding and enhance design and safety standards. TDC stipulates that new homes should be of 3 storeys, with no residential accommodation on the ground floor, built on plots with a minimum 225 sq.m plot size (treble the existing plot size). All new dwellings must contribute, through S106, to the wider regeneration of Jaywick. The Jaywick Local Plan policies say nothing specifically about further development of caravan parks, or, indeed, development of leisure or holiday facilities outside of the chalet “estates”.
- 1.51 The Local Plan envisaged the preparation of a ‘**Jaywick Masterplan**’. However, the proposals proved unpopular with residents. In 2008, a more inclusive approach was adopted in the form of the **Jaywick Regeneration Framework**, steered by the multi-agency partnership Jaywick Strategic Leadership Group (JSLG), led by Essex County Council. The JSLG specifically included, within its work programme, the intention of “*securing private investment to bring jobs, training, economic activity and prosperity to the entire coastline from Jaywick to Clacton, through a comprehensive seaside renaissance programme*”. Public investment is required to improve and boost the seaside and tourist economy; this

¹⁴ See 2006 Jaywick Regeneration Framework, quoted in CABE Sea Change report.

‘renaissance’ is likely to be phased over the period 2014 to 2024. The regeneration and transformation of Jaywick over a 15 year period is estimated to require total investment of £45 million to £75 million¹⁵. In November 2009, the JSLG was amalgamated with the much wider-ranging ‘**Coastal Renaissance Partnership Board**’, with responsibility for regeneration along the entire Tendring coast.

- 1.52 Officers from Essex and Tendring Councils are now looking at long-term options that would involve the gradual redevelopment of the Grasslands and Brooklands Estates – which are most at risk of flooding – for tourist uses, with existing housing where possible replaced by better quality holiday accommodation. These proposals require the provision of new housing out of the flood zone and sites in West Clacton are being investigated as part of a ‘**West Clacton Vision**’ document.
- 1.53 Proposed plans for Jaywick in the **Tendring draft Core Strategy (2010)** are set in relation to overall plans for Clacton and state that “*Jaywick will address quality new housing for local people and a range of holiday accommodation taking advantage of its new beach and other leisure facilities*”. A specific objective, CL7, states: “*Deliver regeneration and tourism activity in Jaywick*’. *Jaywick is specifically identified in Core Policy 12 as a ‘Regeneration Area’*”.
- 1.54 A number of ‘Clacton Key Projects’ are identified of which Project 3 is ‘Regenerating Jaywick’. The changes envisaged for the ‘chalet estates’ between 2011 and 2031 include the acquisition of vacant sites, the removal of substandard and potentially unsafe properties, improvements to the public realm, provision of new recreational open space and provision of new residential development outside the high flood-risk area. Development is to be compatible with flood risk restrictions – but can promote the area as a destination for tourists and visitors. Policies in the Council’s Site Allocations Document “*will provide the special criteria against which development proposals in Jaywick will be assessed*”. Transforming the chalet estate areas should encourage more visitors, supporting jobs in leisure and tourism.
- 1.55 Whereas the emphasis on improving housing is a direct follow-on from the Local Plan, the references to encouraging tourism are new. The beach is specifically referred to as the area’s greatest asset; there is the potential to develop a service-based economy in an area of high unemployment.
- 1.56 The implementation of this project requires significant funding from central and local government as well as the private sector and, with an emphasis on short to medium term delivery, its immediate future must be considered uncertain. Essential infrastructure is also critical particularly the expansion of sewerage works for West Clacton.
- 1.57 There is no specific reference to caravan parks within the Jaywick Regeneration policies. However, Core Policy 15 covers tourism throughout the district and is concerned with safeguarding existing parks and supporting proposals for the expansion of parks and improvement of facilities. It also supports the relocation of parks away from areas at risk of flooding and erosion where this does not conflict with other policies in the Core Strategy. Development Policy 11 on ‘*Occupancy timescales for tourist accommodation*’ limits residency of newly provided or re-located chalets and caravans to the period 1st March to 31st

¹⁵ Jaywick Strategic Leadership Group, June 2009 update

October where the site is located in an area of flood risk. Elsewhere the residency limit is longer, running from 1st March to 14th January, or 10.5 months of the year.

- 1.58 With the Core Strategy yet to be adopted, Tendring District Council has taken steps to introduce interim planning policies which deal with development proposals in Jaywick's Core Regeneration Area¹⁶ in its **Interim planning policy for Jaywick (December 2010)**, reflecting not only PPS25 but also the recent Flood Risk Study and the emerging SMP¹⁷.
- 1.59 Overall the interim policies acknowledge that the flood risks to parts of Jaywick require a more robust response than the adopted Local Plan provides. This is particularly critical in the Grasslands and Brooklands area, which is likely to suffer most from flooding. The vision is of an area progressively reverting away from being a predominantly residential area. New uses to be encouraged will need to be less affected by major flooding in terms of the severity of consequences – such as tourist attractions, holiday accommodation and employment generation.
- 1.60 Interim Policy JAY1 requires all proposals for residential development or domestic extensions to be supported by a Flood Risk Assessment.
- 1.61 Interim Policy JAY2 specifically deals with residential development in Brooklands and Grasslands. The sole objective is to stop all new permanent residential development in the area. It states:

New permanent residential development will not be permitted in the 'Brooklands and Grasslands' area of Jaywick..... This includes proposals for the construction of new dwellings, replacement of existing dwellings and conversion or change of use of non-residential buildings to residential use.

The only form of new accommodation that will be permitted will be permanent holiday homes of high quality design to replace an existing substandard residential dwelling that shall only be occupied between 1st April and 31st August in any one calendar year. To achieve this, the Council will impose occupancy conditions on the grant of planning permission.

Proposals for extensions or alterations to existing residential properties within this area that have the potential to bring about a net increase in the number of occupants the dwelling can accommodate will not be permitted.

Proposals for minor alterations and improvements that do not have the potential to bring about a net increase in the number of occupants the dwelling can accommodate will be judged on their individual merits.

- 1.62 The interim policies also cover the adjacent 'Village' area. In an ideal world this part of Jaywick might also be transformed by 2026; however as the planning problems are less severe than in Brooklands/Grasslands, it is not the Council's priority to direct settlement away from this area until the problems in Grasslands and Brooklands are addressed. The policy is to

¹⁶ This includes the Grasslands and Brooklands Estates as well as the adjacent Village Area.

¹⁷ The interim policy was passed by Tendring District Council in 15th December 2010 was rescinded on the 6th January 2011 in response to protests by local residents and challenge by local councillors representing the area. It is nonetheless instructive to include the details of the proposed policy here as an illustration of one of the options for planning policy being considered for Jaywick.

support the long-term retention of the local community and seek to bring about ‘environmental, economic and flood safety enhancements’. The main purpose of Interim Policy JAY3 is to prevent any development that results in a net increase in the number of people at risk of flooding, alongside improving the safety of dwellings as opportunities for rebuilding arise.

- 1.63 New dwellings on vacant sites will not be permitted but proposals for replacement dwellings will be considered subject to meeting strict criteria as regards meeting emergency access/egress requirements, being a minimum of two storeys in height, able to withstand water pressure from a 1 in 100 flood event, has no more bedrooms than the original dwelling, has no bedrooms on the ground floor and the ‘footprint’ is no greater than the original property.

Sustainable Community Strategy

- 1.64 Specific objectives for Jaywick in **Tendring’s Sustainable Community Strategy (2007)** include the completion of the final phase of the Jaywick regeneration project, with several new housing developments and associated services. By 2016 it is expected that environmental enhancement and public realm projects will have transformed the area. As elsewhere, educational standards will have increased and crime reduced. Deprivation will be tackled on a number of fronts, tailoring mainstream public service activities to support deprived areas through neighbourhood management, environmental enhancement and capital investment. The workforce will be upskilled and housing will be improved, with additional affordable homes provided. Increasing numbers of people living in Jaywick will say that they are able to influence decisions and access services with ease. The district’s leisure and tourism ‘offer’, including attractive resorts and marine heritage will be improved, attracting more visitors and creating jobs.
- 1.65 Safeguarding the district’s attractive environment is a particular issue and an important objective is to address climate change at a local level, with particular reference to coastal and inland flood protection.

Strategic Flood Risk Assessment

- 1.66 Before an area can be regenerated there is a legal requirement to carry out a study into the risk of flooding. Tendring District Council (TDC) commissioned JBA Consultants to produce the **Jaywick Strategic Flood Risk Study (May 2008)**. The flood hazard mapping provided in the study will assist in the application of a sequential approach to future re-development plans by identifying land areas with the highest and lowest risks arising from potential flooding, (in line with the government’s PPS25 *Development & Flood Risk*, introduced in December 2006). An ‘exception test’ can also be adopted if there are large areas in Flood Zones 2 and 3 and where the sequential approach cannot deliver acceptable sites, but where some continuing development is needed for wider sustainable development reasons, to avoid social and economic blight and where essential operational infrastructure must remain operational during floods.
- 1.67 The ‘exception test’ is necessary for planning redevelopment within Jaywick. TDC anticipate a pragmatic approach, with analysis feeding in to the Regeneration Framework for the area.

1.68 The summary and conclusions of the Jaywick Strategic Flood Risk Study state:

'...that the whole coastal part of Jaywick is within the high flood risk zone (FZ3) though is currently defended to a high standard. Behind the sea walls there remains a residual flood risk of high hazard to lower lying areas of Jaywick that will increase markedly over time due to sea level rise (current defences could be overtopped at the design storm 50-75 years in future). Under PPS25 the area should therefore not be selected for new development unless the Exception test can be passed. Under the Exception test of PPS25 any redevelopment needs to be shown to be safe for the life of the development. The higher ground such as in parts of Brooklands should be favoured for siting of more vulnerable development such as health facilities and housing. New development should not increase the overall flood risk. Raising land is a possibility but has significant cost implications and practical difficulties close to existing developments. Improvements to planning for emergency access and egress following a breach will be needed.

1.69 The study also commented on other parts of Jaywick. Plans for precautionary evacuation of all caravan sites within the floodplain, the Grassland area and lower parts of Brooklands should be considered further due to the high hazards predicted should a sea wall failure occur on a significant tidal surge.

1.70 Sites at Brooklands and Grasslands were considered most at risk. Three categories of response were identified:

- *reducing the risk of breaching affecting Jaywick by improving the beach and sea defences and raising the counterwall.* The Environment Agency has a project to improve the beach in front of Brooklands and reduce the risk of breaching with further offshore groyne and beach replenishment – estimated cost £9million. These do not eliminate the risk of breach – especially close to the Jaywick ditch outfall structure. A breach here would have the highest impact. Raising the counterwall to a level of 4.5m AOD from its current level would cost £0.5million
- *reducing the consequence by raising land when re-developing sites, re-siting existing properties and building more flood resistant housing.* The land level in Grasslands is 1.6m AOD and Brooklands averages around 2.6m. The predicted level of flood water in the event of a tidal breach is 2.9m AOD, but allowing for climate change rises to 4.0m AOD by 2107. The cost of raising land in potential redevelopment areas would be felt through new infrastructure and could be very high, (£9,000 to £16,000 per property at 30 to 40 properties/ha)
- *improvement of emergency access.* Many access roads pass over low ground near Jaywick ditch. A tidal breach could result in rapid flooding, cutting off access to coastal property. The only access is via beach paths, the counterwall and roads from Seawick if not also breached. Main roads could be cut off for 24 hours.

Shoreline Management Plan

- 1.71 The **Essex Shoreline Management Plan (1997)** includes Jaywick within Coastal Units 7a and 7b, part of the stretch running from Colne Point to Walton-on-the-Naze. It lists the following as primary objectives for the Jaywick coast area:
- to defend urban and developed frontages specifically at Jaywick.
 - to seek to protect defences by foreshore recharge or other soft engineering options wherever possible
 - to provide effective defence for people and land against flooding and erosion where economically, technically and environmentally justifiable and sustainable
 - to continue to monitor beach levels along the frontage particularly adjacent to the fishtailed breakwaters (e.g. at Jaywick)
 - to consider means of encouraging tourism and recreation where appropriate when appraising coastal defences for the frontage.
- 1.72 The recommended policy for the short (up to 10 years) and longer term is to “*hold the line*”. The sea defences at Jaywick were considered to be in a good state of repair. However, much of the evidence referenced dated back some years – e.g. the Clacton Beach Monitoring Report of 1992, and circumstances may have changed in the interim to 1997. The Gunfleet Sailing Club commented that the Jaywick scheme of rock armour fish-tail groynes had not been totally successful; at high water the sea hits the protection wall and in places the toe has been exposed. Currents around the groynes have proved to be quite dangerous and investigation is required. The Club also criticised breakwaters made of loose rock, considered unsuitable when in the vicinity of holidaymakers, especially children and sailors. There was some concern expressed about a shortage of sediment for beach nourishment due to dredging and groynes.
- 1.73 The **draft Essex and South Suffolk SMP (ESSSMP) 2010** breaks the coastline into different sections and Jaywick is covered by Management Unit C: Tendring Peninsula, Policy Development Zone C4 (Seawick, Jaywick and St Osyth Marsh). The overall intention for the entire Peninsula is to “*sustain and support the viability of the seaside towns and their communities, tourism and commercial activities*” and this generally means a continuation of the current management approach to “*hold the line*” where there are defences. The defences are under pressure but it is important to sustain the seafront so as to ensure the viability of communities. However, a gradual move to more sustainable flood risk management for the low-lying parts of the Tendring frontage is envisaged – and this will require working with communities.
- 1.74 The draft plan comments on the situation at Jaywick as follows:
- At Jaywick, the situation is very complex and sensitive. The flood defences have recently been strengthened and protect the communities of Brooklands, Grasslands and Jaywick village, plus important tourist facilities (caravan parks and golf club). However, the sea bank is under significant pressure, and sustaining it in the medium and long term will require significant investment, particularly in the eastern half of the policy*

development zone. Clearly, any change in the shoreline management approach would only be possible in combination with significant adaptation for the people and businesses in the area. The SMP's intent of management for Jaywick is to support the process that Tendring District Council and Essex County Council are carrying out through the Local Development Framework to develop a sustainable long-term solution. In the short term, the intent is to hold the existing frontline defences where they are now. This period up to around 2025 is the minimum time needed to allow the land use adaptation that may be needed. In the medium and long term, the best option is likely to be a mixture of land use changes, flood defences and incident management.

- 1.75 The headline recommendation for the management policy is summarised as “*hold the line*” for the period up to 2025 and from 2026 to 2055; it is “*managed realignment*” after 2056. However, the supporting text indicates that after 2025 residential settlement would be best re-directed away from the flood risk zone, whilst ensuring continued use of the area for leisure, recreation and tourism, where possible linked with the development of new intertidal areas. This suggests that “*managed realignment*” is the preferred policy well before 2055¹⁸.

Responses to regeneration and adaptation in Jaywick

- 1.76 Jaywick is located within the cluster of settlements that is included in the Haven Gateway growth area IDP package focusing on coastal town regeneration. The regeneration of Jaywick is fundamentally linked to that of Clacton and part of the growth area strategy has been to link the whole of the Tendring peninsula with a network of green corridors although those proposals have not been progressed.
- 1.77 The bottom up and more inclusive Jaywick Regeneration Framework developed in 2008, following the abortive masterplan, included a programme which was intended to help secure private investment to bring jobs, training, economic activity and prosperity to Jaywick and the entire coastline to Clacton through a comprehensive seaside renaissance programme. This required long term public investment to catalyse the seaside and tourist economy in the area over the period 2014 to 2024. The regeneration and transformation of Jaywick over a 15 year period is estimated to require total investment of £45 million to £75 million.¹⁹
- 1.78 It is unlikely that this regeneration framework would have been as consistent with the proposed policy to move progressively toward holiday-focused development in parts of Jaywick. In any case, progress to date has been relatively slow and the Jaywick Partnership has been subsumed into a wider Tendring Coastal Partnership.
- 1.79 Some of the key regeneration activity and proposals have included

¹⁸ One of the changes made to the draft ESSSMP, still in the process of being finalised at the time of writing, was in relation to the policy for Jaywick, Seawick, Leewick and St Osyth. As set out in the EA Shoreline Snippets update on the ESSSMP “The current line will be held in epoch 1 and epoch 2. In epoch 3 there is a dual policy of either managed realignment or hold the line depending on further work as part of Tendring District Council’s Local Development Framework and is conditional on landowner agreement and support. This is a change from the draft plan which proposed managed realignment in epoch 3”.

¹⁹ Jaywick Strategic Leadership Group, June 2009 update

- *development of Jaywick's Martello Tower as a new centre for creativity & arts.* This was funded by Essex County Council, Tendring District Council, Arts Council England, Heritage Lottery Fund and English Heritage in 2005
- *addressing Jaywick's green spaces* which are in need of improvement because, like its roads, they are not publically owned
- *affordable home development* adjacent to the Grasslands estate and on Jaywick Lane
- consideration of a *seaward promenade, East Reef*, at Jaywick alongside a new Dive Centre and aquarium which would be consistent and complementary to the plans for enhanced watersports facilities at Clacton. EEDA funded Landmark East to carry out a feasibility and design strategy for the Jaywick frontage. However the proposal has not been advanced since 2007 and does not form part of the proposals set out in the Core Strategy
- with specific reference to Jaywick, the IDP suggested *national government sponsorship* and long term funding commitment would be necessary to deliver against the regeneration objectives in Jaywick. It proposed:
 - to establish a new sense of trust and collaboration with residents that enables them to shape the future of their community
 - to explore credible and cost-effective solutions to the chronic problem of poor housing
 - to develop proposals that are capable of supporting existing residents during a period of long-term change; and
 - to consider ways of securing private investment to create jobs and prosperity for local people in the future.

1.80 In some ways, all of this activity is superseded and set in a new light by recent activity. Officers from Essex and Tendring Councils are now looking at ideas which involve the gradual redevelopment of the Grasslands and Brooklands Estates – which are most at risk of flooding – for tourist uses, with existing housing eventually replaced by better quality holiday accommodation. Although not yet been enshrined in planning policy, this long term strategy underpins the work of the Jaywick Neighbourhood Team which works with the residents of Jaywick through the Jaywick Community Forum, the Homeowner Occupier Group and other local groups. The issues are challenging and the changes proposed are not universally popular but this type of engagement is considered to have contributed to an improvement in the relationship between the authorities and the residents of Jaywick.

Summary comment and observations on compatibility in Jaywick

1.81 The Core Strategy (CS) states that TDC will “assist the Environment Agency in implementing the Essex Shoreline Management Plan and decisions relating to future development will have regard to that plan”. However, Core Strategies look, at most, 20 years ahead, whereas the SMP's time horizon is far longer. All CS development proposals will be considered against

the ‘sequential test’ of PPS25 ‘Development and Flood Risk’. In the case of Jaywick, so far it has been considered that the benefits of regeneration outweigh the risk of flooding and proposals for development will be assessed against the ‘exceptions test’ and must meet the detailed criteria of the test. The Jaywick SFRA states clearly that most of the settlement is in Flood Zone 3 and hence at risk.

- 1.82 Local Plan policies controlling the development of new dwellings generally appear to meet the criteria of the PPS25 ‘exceptions test’ as long as policy is to “*hold the line*”. However, investment in new dwellings in the Brooklands and Grasslands areas, even where no living accommodation is on the ground floor, appears to be at odds with “*managed realignment*” of coastal defences in around 45 years²⁰. It is unlikely that any mortgage finance would be available to fund new housing in the area ‘at risk’ from flooding due to “*managed realignment*” in the longer term; insurance would also be very difficult to secure. The initial policy aim of the Core Strategy and Sustainable Community Strategy to improve the chalet estates with selected new housing looks unachievable in this context. However, the recently proposed ‘Interim Planning Policy for Jaywick’ took a very different approach which is consistent with the latest SMP guidance. It recommended a total ban on new housing on vacant sites in the ‘Core Regeneration Area’ and a ban on rebuilding dwellings in the Grasslands and Brooklands estates. The policy aimed to achieve the relocation of the population of these two estates to areas of low flood risk. It remains to be seen how those proposals will be taken forward.
- 1.83 However the draft Core Strategy policy to encourage tourism and the vision of a “better beach” by 2031 must also be open to challenge in the context of a move to shoreline “*managed realignment*”. The Jaywick Sands are clearly an important asset for tourism and there is no indication from the draft ESSSMP that these will disappear in the foreseeable future, although their location may shift.
- 1.84 In the light of a suggested move in the draft ESSSMP to the “*managed realignment*” of coastal defences, draft Core Strategy Policy 15 on Tourism is likely require the re-location of several caravan sites in Jaywick away from flood risk areas, yet this is not apparently picked up by the Jaywick site specific policies (CL15, 15a and 16) which concentrate on the chalet estates, nor features in the work planned for the JSLG (now to be undertaken by the Coastal Renaissance Board into which the JSLG merged in 2010). Any re-located or additional caravans will be constrained by Development Policy 11, preventing the occupancy of caravans in winter months.

Brightlingsea

History of Brightlingsea

- 1.85 Brightlingsea lies on Brightlingsea Creek within the Colne Estuary. It is a small coastal town with a population of around 8,750, located in a sensitive setting, surrounded by countryside of recognised environmental, ecological or agricultural importance. It has, however, a significant commuter population and is also popular with people retiring. It is attractive with

²⁰ Note that in Epoch 3, however, provision is made for a dual policy of “*hold the line*” and “*managed realignment*”

conservation areas and has low levels of deprivation. There is a variety of employment opportunities available locally. The Waterside Regeneration Area encourages mixed-use development to enhance vitality and viability, linking tourist areas with the town's shopping centre. Tourism facilities include two holiday caravan sites.

- 1.86 Brightlingsea is home to the Eastern Region Sailing Centre, with a wide range of facilities for coastal dinghy sailing, including training, race training and racing.

Policy framework for Brightlingsea

Local Plan / Local Development Framework (and related statements)

- 1.87 **Tendring District Local Plan's (2007)** planning policies dealing specifically with Brightlingsea focus on selective, sustainable new development and enhancements to the environment, especially along the Waterfront. Policy BR1 is specifically concerned with Waterside Regeneration. It lists acceptable types of development in terms of form and design, geared to enhancing the historic environment, providing for housing, recreation and leisure facilities. Improved public access is important; flood defences must meet appropriate standards. Policy BR2 deals with port facilities, greatly restricting any further development of the port for commercial use. Policy BR3 deals with the mixed-use area making up Brightlingsea Shipyard. As an interim measure, before an SPD for the Waterside Regeneration Area is produced, development must protect the town's employment base through the provision of alternative facilities where a loss is envisaged. Quayside facilities for unloading fish must be retained and public access and mooring must be provided on that part of the river frontage which is not a working quay.
- 1.88 Policy BR4 deals with the storage of caravans and boats and trailers east of Lime Street, minimising conflict with adjoining residential areas. Policy BR5 deals specifically with the protection of the river frontage. To protect the unspoilt frontages on the edge of the town, no additional holiday development will be permitted outside designated areas.
- 1.89 The **Colne Estuary Strategy**, endorsed by Tendring District Council in 1999, was created by a partnership of local authorities, government agencies, the local community and local businesses. It sets out arrangements for co-ordination of agencies with a management remit. It provides the framework for land-use policies and criteria for determining planning applications. The aim is to protect the environment and ensure that economic development is handled sensitively.
- 1.90 The Local Plan proposed the preparation of a **Supplementary Planning Document (SPD)** for Brightlingsea's sensitive waterside area. This has not as yet been published.
- 1.91 In the **Draft Core Strategy for Tendring (2010)**, the spatial vision for Brightlingsea, an 'urban settlement' within the district, is spelt out as follows²¹:

"In 2031, Brightlingsea will be associated with its sailing activities, its attractive riverside setting and easy access to the surrounding countryside.

²¹ See draft Core Strategy, Sections 6.16, 6.17 and Section 10, detailing specific projects 25 and 26.

The attractive town centre will offer a healthy range of shops and services and the waterside will be the focus of varied commercial activities, water sports and other leisure pursuits. Some commercial activities will continue in the harbour, some related to maintaining off-shore wind farms.

The western promenade will provide a range of new leisure facilities and continue to host local events and will have undergone environmental enhancements to improve the area's attractiveness.

A modest amount of quality new residential development will have taken place to meet local demands and needs, including waterside houses but any expansion of the town will be limited by environmental constraints and its single road access."

- 1.92 Four specific objectives are spelt out to sustain a healthy future for a unique riverside town:
- BR1: promote the town's leisure assets
 - BR2: Support a diverse range of shops and services in the town centre
 - BR3: Deliver a modest amount of new housing to meet local needs
 - BR4: Deliver improvements to local services and public transport.
- 1.93 The new housing proposed is to support local shops and services and provide for local needs; it is not designed to accommodate wider growth. This is because there is poor public transport with no railway station; road links to the strategic road network are also poor, relying on the B1029. Four projects have been proposed for delivering modest change in Brightlingsea. One of these (project 28) relates to the extension of the Morses Lane Industrial Estate, well away from the sea front. Project 27, the East Urban Extension, is concerned with providing new family housing, including affordable dwellings. A modest scheme of 60 homes is proposed (out of 150 suggested for the town as a whole). This will help counterbalance the recent development of luxury homes on the waterfront.
- 1.94 Project 25 is concerned with protecting and enhancing Brightlingsea Town Centre, so that it can provide appropriate shops and services to meet not only local needs but those arising from construction and maintenance jobs associated with servicing the Gunfleet Sands off-shore wind farm. Overall it is expected that Brightlingsea will accommodate an additional 150 jobs over the Plan period.
- 1.95 Of most relevance to this study is Project 26, rejuvenating Brightlingsea waterfront. This is the primary 'regeneration' project in the town and the area has been identified as requiring physical enhancements alongside opportunities for water-related activities. Since the Local Plan was prepared the former James & Stone Shipyard has been developed into luxury homes with associated marina facilities and commercial units. Phase 1 is complete and the whole development is due to be completed in the near future. The area to the west will be safeguarded for leisure activities, with environmental enhancements and improved access. The land to the east will be primarily protected for existing commercial activities, many of which relate to sailing, boat building, mooring, chandlery etc. Improved public access to the waterfront and traffic calming measures are also required. Any new leisure activities in the

waterfront area will be compatible with nature conservation values; there will be close working with the Colne Estuary Partnership to achieve this.

Sustainable Community Strategy

- 1.96 Specific objectives for the area around Brightlingsea in the **Tendring Sustainable Community Strategy (2007)** are focused around bringing new leisure investment opportunities and provide a successful management strategy for the estuary. Brightlingsea will benefit from new waterside housing, together with associated leisure industry spin-offs such as restaurants and bars. The district's leisure and tourism 'offer', including attractive resorts and marine heritage will be improved, attracting more visitors and creating jobs.
- 1.97 Safeguarding the district's attractive environment is a particular issue and an important objective is to address climate change at a local level, with particular reference to coastal and inland flood protection.

Strategic Flood Risk Assessment

- 1.98 The **Tendring District Council Strategic Flood Risk Assessment**²², published in 2009, states that "in Brightlingsea, the 'Town Front' has no protection and is liable to flooding as it did in 1953. West of the town centre rock or block protected clay banks, road ramps and concrete parapet with a level of 4.7m AOD or more. 1953 level was 4.09m AOD".
- 1.99 The study simulated the consequences of breaches in coastal defences on areas currently proposed in the draft Core Strategy for possible development. In the case of Brightlingsea the summary indicates that there could be significant problems:

'The situation at Brightlingsea is ... complex as there are parts of the town that are not defended and there are also banks to the north that can result in the town becoming cut off as occurred when there were multiple failures in 1953. A breach in the bank to the west of the town centre results in rapid spreading of water across the marsh affecting a small part of the area of development search in current conditions. There is also some exchange of flow towards the town centre should this not already be flooded directly. With climate change the depths and hazards increase markedly although only a limited additional area of development search is affected'.

Shoreline Management Plan

- 1.100 Brightlingsea is included in the **Essex Shoreline Management Plan (1997)** as part of Coastal Unit 6c, part of the stretch from Mersea to Colne Point. The plan states that compared to adjacent Essex estuaries, the Colne has experienced relatively little morphological change due to erosion over the preceding 100 years. However, the long term prognosis is more pessimistic as sea levels rise. The Colne could become progressively drowned, with a loss of salt marsh and mud flat and an increased flood risk for urban areas.

²² Strategic Flood Risk Assessment, Final Report, March 2009: produced by JBA Consulting for Tendring DC and Babergh DC.

- 1.101 The objectives of the Plan are similar to those for other coastal towns and settlements. They include:
- providing effective defence for people and property against flooding and erosion, where economically, technically and environmentally justifiable and sustainable
 - defending urban and developed areas such as Brightlingsea
 - maintaining defences in their current position whilst evaluating the practicability of all sustainable coastal defence options
 - defending all critical nature capital within the Colne Estuary such as at Brightlingsea Marsh.
- 1.102 The preferred policy is to “*hold the line*” at all urban and developed areas where this is economically justifiable, such as at Brightlingsea. In the longer term (beyond 10 years), and on other parts of this stretch of coast, managed set back will only be undertaken where it is demonstrated that this is the only sustainable defence policy.
- 1.103 The draft **Essex and South Suffolk Shoreline Management Plan’s (2010)** proposals for Brightlingsea form part of Management Unit D: Colne Estuary, policy D4. For the Colne Estuary as a whole the intention of the draft ESSSMP is to “*sustain and support the viability of communities, tourism and commercial activities while creating new intertidal habitats and focusing flood risk management on frontages where it is most needed*”. Flood defences will be maintained to the majority of currently defended land, including all dwellings and key infrastructure at risk of flooding. In all 3 epochs, the proposed policy is to “*hold the line*” for the Brightlingsea frontage, with existing flood defences held on their current alignment. It should be noted that the draft policies for the adjoining area “*Flag Creek to northern bank to Brightlingsea*” envisage “*holding the line*” through to 2025, “*managed realignment*” in the period 2026 to 2055 but a return thereafter to 2105 of “*holding the line*”. This would involve a breach of the existing defence whilst continuing flood defence to dwellings and the road.
- 1.104 In the consultation response to the draft ESSSMP, some concerns were raised by the Colne Estuary Partnership over the draft policy in epoch 2. Specifically in relation to the proposal in and around Brightlingsea there was concern that managed retreat options were already being discussed at Eastpoint Marsh, to the east of Brightlingsea further inland on Flag Creek. Those options firstly might be implemented prior to 2026 and secondly could have implications for sediment movement down the Creek with financial and environmental costs for the harbour and the marina of the increased dredging this would necessitate. There are no specific managed realignment proposals as yet and these would be dealt with scheme by scheme – making detailed concerns a bit premature at this stage – but the fact the issues are raised does indicate the concerns raised by some parts of the local community in relation to long term changes to policy.

Responses to regeneration and adaptation in Brightlingsea

- 1.105 Brightlingsea has not ranked amongst the strategic priorities for regeneration at the regional level but because of its port, it has been identified as being of importance to the current and

future expansion plans to support the growth of the offshore renewables industry – and to some extent other port and logistic centres (although this is less important for Brightlingsea).

1.106 Brightlingsea has been able to benefit from regional economic development funding in the form of the Market Towns Initiative which was designed to help smaller rural towns identify and address local problems with their development and regeneration. A Community Reach Partnership was formed in Brightlingsea, Alresford, Thorrington, St Osyth and Frating which delivered around £340k funding which with match funding was able to deliver around £900k investments into the partner rural communities. The funding has now ceased but up to 2008 the projects delivered in Brightlingsea included

- the establishment of a foot ferry service between Brightlingsea and St Osyth
- the creation of Springmead Gardens in the grounds of one of the town's historic houses, and the Lozenge a nature area both on previous derelict land and various sports and play facilities for children and young people
- grants to support local farmers markets and the Brightlingsea Music Festival, a highly successful free outdoor festival.

1.107 As set out in the draft Core Strategy, the priority for physical regeneration has been the waterside area with the intention of supporting continued commercial activity on the eastern side of the waterside and sailing and other leisure activity on the western side leading on to the beach and beach huts on the Western Promenade. In 2008, the first phase of a major mixed use residential and marina development was completed. The homes created in phase 1 are 95% sold and the marina berths now also almost all let. It has so far been possible to attract privately funded high quality development into the town but it is likely that the downturn in the housing market and economy will have slowed further development at the site.

1.108 The protected status and competing uses of the estuary require careful management and the Colne Estuary Partnership was established in 1999 in response to the estuary being designated a European Marine site under the EU Habitats Directive 1994. The partnership was originally a collaboration between Colchester Borough Council and English Nature (now Natural England) to develop a management strategy for the Colne Estuary. It is now run as an operation management and advisory committee primarily by the University of Essex and the Brightlingsea Harbour Commissioners with funding from Tendring District Council and Anglian Water. The Partnership has historically been able to draw on a number of sources of EU and LA funding to support a funded Estuary officer. More recently, a grant from the Knowledge Transfer fund and other University of Essex match funding has been used to create the role of researcher and coordinate with the estuary officer at Brightlingsea. This is supporting the partnership's continued activities. Its focus is not delivering economic development but ensuring the appropriate management of the estuary as well as providing capacity and a framework to respond to new challenges or opportunities.

Summary comment and observations on compatibility in Brightlingsea

- 1.109 The land use planning, sustainable community and shoreline management policies for Brightlingsea, both current and proposed, appear compatible. The regeneration planning policies listed in the Local Plan relate specifically to the Waterfront. Building on the foundations established in the Local Plan, the draft Core Strategy acknowledges that much regeneration has already taken place and further improvements to the physical environment are proposed. All are within the area designated as covered by the draft ESSSMP's "hold the line" policies for the foreseeable future. The Sustainable Community Strategy envisages Brightlingsea developing its tourist 'offer' through environmental improvements and new leisure facilities. There is no indication, however, that the rate of new development proposed will increase the risks of flooding.

West Mersea

History of West Mersea

- 1.110 West Mersea is located on Mersea Island within the common mouth of the Colne and Blackwater estuaries. Mersea Island's connection to the mainland is a causeway dating back to Roman times. The Causeway is a raised road bridge across the low lying salt marshes and waterways that separate Mersea Island from the mainland and is submerged for periods on some Spring Tides²³.
- 1.111 The town has a population of around 7,500 in and is a relatively self-contained coastal community, known for its 'quality' tourism and recreation. It has adjacent holiday caravan sites. Mersea Island has an active business community with strong links to the town's historic and still important fishing industry such as water based leisure activities including marine engineers, chandlers, boat yards and sail makers. Mersea continues to be an important source of oysters serving the London restaurant market and its own local tourist industry based on a sailing and boating.
- 1.112 Over the estuary from West Mersea it is possible to see Bradwell nuclear power station on the horizon. Generation at the site ceased in 2002 and the site is being decommissioned. Plans for a new nuclear power station on the site have been objected to by the West Mersea Bradwell Monitoring Committee. Key concerns surround the risk to the site from climate change and risk to the ecosystem as a result of the operation of cooling towers, together with more general concerns relating to the image of the area for tourism.

Policy framework in West Mersea

Local Plan / Local Development Framework (and related statements)

- 1.113 The land use planning policies covering West Mersea are provided by the **Colchester Adopted Core Strategy (2008)** and associated **Site Allocations and Development Policies (both 2010)** which cover the period up to 2021. Insofar as the 'spatial vision for 2021' relates to West Mersea, it is listed with Tiptree and Wivenhoe as a key rural district centre; all are

²³ See www.westmersea.org

‘settlements that provide essential services and facilities to their rural hinterland. The historic character and distinctiveness of these settlements and other villages will be protected and enhanced’.

- 1.114 The ‘vision’ goes on to state *‘The West Mersea waterfront will be conserved for its historic maritime character and distinctive maritime-related local businesses. There are some limited development opportunities in West Mersea and approximately 280 new homes will be developed during the Plan period, including over 200 homes that have already been approved or completed. An additional 173 sq m of net retail floorspace will be sought to service the residents of Mersea Island. Key facilities to be delivered in West Mersea include allotments and a new health centre.’*
- 1.115 West Mersea lies within the Coastal Protection Belt where development is restricted; it is not permitted where it *‘would adversely affect the open and rural character of the undeveloped coastline and its historic features, sites of nature conservation importance and wildlife habitats...Development will be supported at appropriate locations to improve public access, visual amenity and rehabilitate the natural environment. Development will need to minimise and mitigate adverse impacts on river, coastal and ground water quality. The Council will seek to direct development away from land at risk of fluvial or coastal flooding in accordance with PPS25, including areas where the risk of flooding is likely to increase as a result of climate change.’* Any new development required or compatible with a rural location must demonstrably apply the sequential approach to land at risk of flooding in line with the guidance of PPS25; it must also demonstrate that it provides for any necessary mitigating or compensatory measures.
- 1.116 The undeveloped areas of the Colne Estuary and coast are of particular importance and are protected; Colchester Borough Council has statutory obligations under the Habitats Directive to protect important habitats and species here. Regeneration is supported where it enhances the river’s recreation and nature conservation values. The Coastal Protection Belt includes Mersea Island; this is a county-wide designation to protect the ‘sensitive character of the undeveloped coastline which could be harmed by development that might otherwise be acceptable in a countryside area’.
- 1.117 The Strategic Flood Risk Assessment will be used to direct new developments away from areas at risk from fluvial and/or coastal flooding. Where development occurs in areas with a known flood risk, this will be minimised by applying the sequential test in accordance with PPS25; practical and safe mitigation measures will need to be adopted to alleviate risk to people and property. A network of green corridors and sites will be increased to aid the dispersal of species and the provision of sites for future flood waters so as to avoid harm to the built environment.
- 1.118 The Site Allocations Development Plan Document was adopted after public consultation and independent Inspection on 13th October 2010. West Mersea is not included in any of the Regeneration Areas detailed. However, the document does make special reference to policies affecting the expansion of static or touring caravan parks and two of these are on Mersea Island.

- 1.119 In the case of East Mersea, an expansion of Coopers Beach Holiday Resort of up to 7.8 ha will be permitted subject to conditions. These include the avoidance of sites in Flood Zone 3a and restrictions on occupancy in winter months. In West Mersea an extension to Waldegraves Holiday Park will be permitted on adjoining land of up to 6.86 ha. Again, the conditions prevent sites on any land designated as Flood Zone 3a and there are winter occupancy restrictions as well.
- 1.120 The Development Policies Development Plan Document, also adopted on 13th October 2010, includes two particularly relevant policies: DP20: Flood risk and management of surface water drainage and DP23 Coastal area.

Policy DP20 (Flood risk and management of surface water drainage)

- 1.121 The adopted policies relating to flood risk refer to the Strategic Flood Risk Assessment commissioned by Colchester Borough Council (CBC) in support of the Core Strategy and associated policies. It states that by and large Colchester has sufficient land in Flood Zone 1 (low risk) where most development should be steered. Development in higher risk Flood Zones 2 (medium) and both 3a – high probability and 3b – functional floodplain – should be restricted to certain categories where there is an identified need. The policy states:

‘Development will only be supported where it can be demonstrated that the proposal meets requirements in PPS25 (Development and Flood Risk), recommendations in Colchester’s Strategic Flood Risk Assessment, and includes satisfactory flood defence measures or flood mitigation measures such as Sustainable Drainage Systems (SuDS) to minimise the risk of increased flooding both within the development boundary and off site in Flood Zones 2 and 3. Proposals that include measures to enhance the flood resilience of new or renovated buildings will be encouraged’.

Policy DP23 (Coastal Areas)

- 1.122 The policy states:

‘Within the Coastal Protection Belt and along the undeveloped coast an integrated approach to coastal management will be promoted and, development will only be supported where it can be demonstrated that it:

- (i) Requires a coastal location and is located within the developed area of the coast*
- (ii) Will not be significantly detrimental to conserving important nature conservation, historic environment assets, maritime uses and the landscape character of the coast*
- (iii) Will deliver or sustain social and economic benefits considered important to the well being of the coastal communities; and*
- (iv) Provides opportunities and scope for adaptation to climate change.*

In exceptional circumstances, development may be permitted where it is proven that the proposal provides an over-whelming public or community benefit that outweighs all other material considerations. In such instances applications must demonstrate that the site is the only available option and be acceptable in terms of its other planning merits.

Proposals for all development and change of use on both the landward and seaward sides of Coast Road, West Mersea, will be expected to enhance the existing traditional maritime character of the West Mersea Waterside Area of Special Character, and its role as a major yachting, fishing and boating centre. Proposals which result in the development of existing undeveloped areas of foreshore will be refused.

New moorings for permanent residential houseboats will not be permitted in coastal areas because of their landscape and environmental impact. Applications for infrastructure to support existing houseboats including jetties, sheds, platforms and fences and for those replacement houseboats or houseboat alterations considered to result in material alterations will be considered on the basis of their scale and impact on surrounding amenity, environment and landscape’.

1.123 In its explanation of the rationale for this policy, Colchester Borough Council states:

‘Climate change including sea level rise is likely to present increasing pressure on the management of coastal habitats and coastal communities along Colchester’s coastal fringe. Emerging national policy of development at the coast has highlighted the need to identify ‘Coastal Change Management Areas’. The second draft Essex Shoreline Management Plan has shown that the West Mersea coastal frontage is highly vulnerable to the effects of climate change and coastal processes. It will be important that future land uses and developments along this frontage can demonstrate the ability to adopt a roll back approach in response to changing local climatic conditions’.

1.124 The reference to the **draft Essex and South Suffolk Shoreline Management Plan** indicates that planning policies for coastal areas of Colchester are taking account of issues such as climate change and its impact on coastal areas and communities. The Coastal Protection Belt was defined in 1984 by Essex County Council. It is intended to protect rural and undeveloped coast from inappropriate developments which would impact on the open character and assets, covering nature conservation, landscape and buildings. The area is unique and requires great priority to be given to restrictions on potentially damaging development; wherever possible any development should be restricted to within the built-up areas of the coast.

1.125 Colchester Borough Council makes specific reference to West Mersea, noting that the majority of the estuarine frontage comprises the West Mersea Conservation Area. The western end of Coast Road was designated as the West Mersea Waterside Area of Special Character in the former Local Plan and this has been carried forward in the Site Allocations Development Plan Document. Colchester Borough Council wishes to conserve and enhance the Waterside and accordingly will only permit development and change affecting existing sites used for boating and marine activities where they remain compatible with the traditional maritime character of the area and have a special need to be located here. The final reference is to the houseboat area of West Mersea. Any further extension of berths is considered unacceptable due to the impact on the surrounding environment.

Sustainable Community Strategy

1.126 The **Colchester Sustainable Community Strategy (2009)** vision for the whole borough and the town of Colchester in particular is summarised as follows:

- excelling as a regional centre
 - working for sustainable economic growth and reducing carbon emissions
 - providing opportunities for everyone to lead healthy lives and to achieve their full potential
 - a great place to live, work, study and visit.
- 1.127 The strategy is tightly focused and actions are restricted to achieving five priorities, concerned with promoting business & employment, reducing traffic congestion, improving Colchester as a visitor destination, promoting healthy lifestyles with quality, affordable housing and creating strong, safe communities. West Mersea is particularly affected by the proposal to ‘make Colchester an outstanding visitor destination and celebrating its heritage, culture and leisure activities’. Specific aims include development of an integrated promotional brand for the borough, including all heritage, culture and leisure assets, parks and green spaces, coast, natural heritage and community pride. New development throughout the borough, including housing and public facilities, will be encouraged to meet high standards of sustainability – thereby promoting energy efficiency and achieving a second priority, healthy lifestyles. West Mersea, along with all other communities, is subject to wide-ranging aims to create new jobs, promote public transport, developing community networks, etc.
- 1.128 There is no discussion of the natural environment except in the context of a visitor attraction and sustainability is only considered in terms of new development.

Strategic Flood Risk Assessment

- 1.129 The **Mid Essex Strategic Flood Risk Assessment (2007)** was jointly commissioned by the four Essex districts of Braintree, Chelmsford, Colchester and Maldon from the Scott Wilson Group. The report explains that ‘the SFRA process is essentially an assessment of flood risk issues at a strategic scale undertaken to inform the spatial planning process at a local scale and forms part of the LDF evidence base’; it is part of the sustainability appraisal.
- 1.130 The detailed study for Colchester involved simulating breaches in sea and river defences at three locations. Two of these are close to West Mersea: the Strood Channel to the north and the earth embankment east of Waldegraves farm, just east of the town. The simulations involved studying 1 in 200 years and 1 in 1000 years occurrences, together with 100 years of modelled climate change. In both instances the impact on the town of West Mersea was relatively small. A breach in the Strood Channel could result in a shallow flood affecting roadways, the sailing club and nearby buildings. A breach by Waldegraves Farm would have most impact on the fields and marshes to the east, not West Mersea.
- 1.131 The detailed study concentrates on examining the flood risks to the primary growth and development sites identified in the Colchester Core Strategy rather than the impact on other settlements where modest development is proposed such as West Mersea.

Shoreline Management Plan

- 1.132 West Mersea lies within Coastal Unit 5 of the **Essex SMP (1997)** which covers the Blackwater Estuary and stretching from Sales Point to East Mersea. Present rates of sea level rise have already affected the lower inter-tidal mudflats which have receded by 500m over 140 years. There has been more limited erosion to the upper mudflats and salt marsh, due primarily to an almost continuous floodbank around the upper shore. The salt marshes are expected to erode further; this can be controlled through managed set back i.e. managed realignment of the flood embankments. The sea defences on Mersea Island are described as in ‘fair’ condition.
- 1.133 A number of recreation and tourism issues are raised in relation to West Mersea. The first is a general shortage of holiday accommodation. The second is the pressure to develop watersports facilities and the third concerns the provision of additional car parking facilities close to the waterfront in the town. Fishing is another important concern. The Plan states that West Mersea ‘supports the largest concentration of trawlers operating from the Essex and South Suffolk coast; the main offshore fishing fleet consisted of around 28 full-time and 22 seasonal fishing vessels.
- 1.134 The preferred policy for West Mersea, as an urban developed area, is to “*hold the line*” in the short, medium and longer term.
- 1.135 In the **draft Essex and South Suffolk Shoreline Management Plan (2010)**, West Mersea is part of Management Unit E: Mersea Island. Draft policies E2: Seaward frontage between North Barn and West Mersea and E3: West Mersea, apply. The draft ESSSMP states that “*the overall intention for Mersea Island is to sustain and support the viability of communities, tourism and commercial activities while creating new intertidal habitats and focusing flood and erosion risk management on frontages where it is most needed*”. This involves maintaining defences for all dwellings, key infrastructure and tourism facilities which are considered to be at risk. In parallel, there will be a realignment of defences which are increasingly under pressure due to natural processes. It is anticipated that most defences, related to both flooding and erosion, will be held on their current alignment. The two areas of the Island under particular pressure are the seaward frontage at East Mersea and the frontage landward of the Strood Channel, with part of the Strood Channel covered by draft policy E4a; it is proposed to realign these landwards, to create a more sustainable natural coast.
- 1.136 In the case of E3, the draft ESSSMP recommends the “*hold the line*” policy for all three Epochs until 2105. The current defended section will be protected throughout and the undefended sections will be left as at present. The standard of protection will be maintained or upgraded. However, proposals for E2 and E4a are different from those for E3. Up to 2026, the advice is to “*hold the line*”, with managed realignment by breach of the existing defence occurring between 2026 and 2055; however flood defence to dwellings, roads and sewage works will be continued. Beyond 2055 this new alignment will be subject to “*hold the line*”.

Responses to regeneration and adaptation in West Mersea

- 1.137 The focus of regeneration and development in Colchester Borough is in the town itself. West Mersea, as a relatively prosperous settlement only growing in response to local need, has not

been a focus of regional or local economic development or regeneration funding. West Mersea has a thriving and impassioned 'island' community and a strong sense of identity and civic pride which supports local businesses and events.

- 1.138 In terms of community or economic development the focus has been on enhancing or securing community and heritage assets. This has been very modest and has included:
- development of a heritage resource centre at the West Mersea Museum supported by local authority and heritage lottery funding in 2009
 - refurbishment of the High Street Community Centre to provide new kitchen, hall and car park facilities was supported by the National Lottery in 2001
 - proposal for the future include a green cycleway between West Mersea and Colchester which would avoid the one busy and congested route on to the island and further support tourism but funding has not yet been allocated by Colchester Borough Council.

Summary comment and observations on compatibility in West Mersea

- 1.139 The land use planning policies adopted by Colchester Borough Council for West Mersea involve only modest housing growth over the period to 2021, contained within the existing town. There is a presumption against development on the coast or along river frontages elsewhere on Mersea Island, apart from extensions to two caravan parks. In these cases, any additional sites must be outside Flood Zone 3a and caravans must not be occupied in winter months. The draft ESSSMP acknowledges that there will be changes to the coastline of Mersea Island over the next 100 years, with a gradual move landwards of the undefended east coast, but West Mersea will be protected throughout.
- 1.140 As long as the extensions to the caravan parks do not involve land at risk of flooding, there should be no conflict with the draft ESSSMP. The limitation on development within West Mersea is compatible with the draft ESSSMP as this advocates a "hold the line" approach for communities and dwellings. However, it is important that development does not encroach along the undefended coast.
- 1.141 The Colchester Sustainable Community Strategy is focused on achieving five specific priorities by 2020 and there is no specific reference to West Mersea; generic policies cover all the Borough's settlements. The coast is recognised as being an asset – possibly undersold at present – and by incorporating this attractive environmental 'offer' into the 'Colchester brand', it is anticipated that visitor numbers will grow. However, the scale of growth anticipated is unlikely to exceed West Mersea's development capacity. Consequently there should be no adverse impact on flooding or erosion risks.

2: Policy Framework: Winterton-on-Sea, Hemsby, Caister, and Great Yarmouth

Introduction

- 2.1 This section provides an overview of land use planning & development policies, sustainable community strategies and flood risk, coastal defence and shoreline management policies for four settlements within Great Yarmouth Borough (GYBC). These are: the urban area of Great Yarmouth (with Gorleston), Caister, Hemsby and Winterton-on-Sea.
- 2.2 In each case, we summarise the current adopted planning framework and any new plans which are currently at ‘consultation’ stage, focusing on specific regeneration proposals. Similarly we record relevant flood risk assessments and both the current shoreline management policies and proposals for the future. Potential synergies and conflicts between development plans and coastal defence plans are identified with a discussion of the practicalities of resolution.

Status of key elements of the policy framework

Land-use planning policies

- 2.3 The current land-use planning policies operating in the case study area are in the **adopted Great Yarmouth Borough Wide Local Plan**, which dates from February 2001. When the Planning and Compulsory Purchase Act 2004 introduced Local Development Frameworks (LDF) to replace Local Plans, the policies were ‘saved’ for a transitional period of three years from the commencement of the Act; however, this expired in September 2007. As the LDF had yet to be adopted, a number of policies were again ‘saved’ following approval from the Secretary of State. These continue to provide the statutory planning framework for Great Yarmouth, together with the East of England Plan.
- 2.4 Work on the LDF has resulted in the publication of a number of **Development Plan Documents (DPD) for consultation**:
- the initial consultation report on ‘issues and options’ for the **Core Strategy DPD** was published in October 2005, with a ‘preferred options’ consultation report looking forward to 2021 following in March 2006. However, following a number of changes in planning policy and the adoption of the East of England Plan in 2008, the Borough Council published a further consultation report in the form of an ‘Amendment to the Core Strategy’ in February 2009. The main change from the previous report was an increase in numbers of dwellings to be accommodated as the planning horizon was pushed forward from 2021 to 2025²⁴

²⁴ DPDs are required to provide a 15 year supply of housing land. In the case of Great Yarmouth BC, this equates to an additional 1,240 dwellings from 2021 to 2025. (This assumes that the Core Strategy will be adopted in 2010).

- alongside the ‘preferred options’ Core Strategy, GYBC published a ‘**Site Specific Allocations DPD**’ for consultation in spring 2007 with three chapters discussing ‘issues and options’ relating to housing, employment & tourism and retailing & leisure
- the Development Control Policies ‘issues and options’ DPD was also produced for consultation in spring 2007
- in June 2010 a Strategic Housing Land Availability Assessment (SHLAA) was published, detailing sites that can potentially deliver housing by 2025
- the most recent land use plan to be published by GYBC and the 1st East Urban Regeneration Company is the ‘**Great Yarmouth Waterfront Area Action Plan**’, which was released for public consultation in November 2010. Covering around 40 ha of the urban area, the plan sets out the planning framework to guide the regeneration of the brownfield and waterfront areas of Great Yarmouth. In addition, the Area Action Plan sets out future aspirations for individual waterfront locations and site design guidance.

2.5 Reference is made to relevant Local Plan and draft LDF policies in the discussion of individual resorts.

Sustainable Community Strategy (SCS)²⁵

2.6 **Changing Lives**, the Sustainable Community Strategy, was published by the Great Yarmouth Local Strategic Partnership (LSP) in November 2008²⁶. Following on from the first community strategy ‘2020 Vision’, produced in 1997, the update covers not only the long-term vision, but also includes a short-term 3 year SCS aimed at meeting that vision. The principal aim of the LSP is “*to drive sustainable improvements in the quality of life for everyone who lives, works or visits the area; ... to solve problems, realise benefits and produce better outcomes through partnership working*”.

2.7 The SCS takes into account a wide range of related plans and guidance, notably the Norfolk Ambition (the SCS for Norfolk) and both the Waveney and Suffolk SCSs. It builds on existing community-based plans across the borough, including those developed by Community Partnerships and the Neighbourhood Management Programme, ComeUnity. There is a particularly strong link with the emerging LDF which has been drafted in parallel with the SCS.

²⁵ Note that the *Best Value: New Statutory Guidance Consultation* (published in April 2011 by CLG) highlights the plan to repeal the Duty to Prepare a Sustainable Community Strategy

²⁶ The LSP is made up of representatives from over 50 organisations, including local government, voluntary and community sectors, faith groups, local businesses and agencies delivering public services locally, such as the police and NHS.

Flood risk, coastal defence & shoreline management plans

Flood risk

- 2.8 Strategic Flood Risk Assessments (SFRAs) are required for all development areas put forward for inclusion in Core Strategies under the LDF process and are commissioned by District/Borough Councils.
- 2.9 GYBC commissioned Capita Symonds to produce a report for Great Yarmouth and Gorleston which was published in September 2009²⁷. Flooding is examined from the perspectives of tidal surge, including over-topping, erosion and breach as well as both river and surface water flooding. The assessments include an examination of the likely impact of future climate change such as sea water levels rising. The SFRAs provide detailed guidance for local councils when drawing up development plans and when implementing development control policies. They outline the guidance in the government's PPS25, both with respect to the 'sequential test' for determining which areas are considered 'best' for development and for following the 'exceptions test' where the 'sequential test' fails to deliver sufficient land, (see below).

Shoreline Management Plans

- 2.10 Shoreline Management Plans (SMP) are designed to provide a high level assessment of a length of shoreline to identify the risks associated with coastal processes (e.g. flooding and erosion), and to minimise the associated risks to the developed, historic and natural environment, in a sustainable way. The SMP identifies policies for each section of the coast. These policies include holding the existing line of defences, realigning the defences inland or undertaking "no active intervention" (i.e. letting nature take its course). While the SMP provides a long term policy framework, it does not identify how this might be achieved. Where the policy is to "hold the line" or 'manage the realignment' of defences, a more detailed study will subsequently be undertaken in the form of a Coastal Strategy Study. This will look at the most appropriate ways in which the policy can be delivered, whether it provides good value for money, assess the impacts on people and the environment, etc.
- 2.11 The Kelling to Lowestoft Ness SMP covers all of the coastline in Great Yarmouth Borough²⁸. An initial draft was published for public consultation in 2006 and over 2,000 responses were received. A final document was published in spring 2010. **The status of the Kelling to Lowestoft Ness SMP (First Review) is explained on the website of the East Anglia Coastal Group: specifically, whilst the final documents have been received by the client partners, the plan has not (yet) been adopted.** During our consultations for this study, we were told that some elements of it were of concern to at least some local authority partners.
- 2.12 As it stands, within the SMP, three time periods are identified. The first runs to 2025, the second runs from 2026 to 2055 and the third runs from 1056 to 2105. Although the SMP is a

²⁷ Great Yarmouth & Gorleston Strategic Flood Risk Assessment, Final Report, September 2009: Capita Symonds for Great Yarmouth Borough Council.

²⁸ Kelling to Lowestoft Ness Shoreline Management Plan First Review, published March 2010. Produced by AECOM Ltd for a consortium of authorities, including the Environment Agency, Natural England, the Broads Authority, Waveney DC, North Norfolk DC, Great Yarmouth BC, Norfolk Coast Partnership

non-statutory plan, it must be taken into account when land use development plans are drawn up.

Case study settlements

Winterton-on-Sea

History

- 2.13 Winterton-on-Sea is located eight miles to the north of Great Yarmouth town, close to the boundary of GYBC and North Norfolk District. Its current population is around 1,600 and there are approximately 650 residential properties. The village developed as a fishing and farming centre but is now primarily an attractive, quiet holiday settlement, with a number of self-catering cottages and 'up-market' chalets. The nearby sand dunes are designated as an Area of Outstanding Natural Beauty (AONB) and are home to a growing colony of terns as well as seals. The village is close to the Norfolk Broads National Park.
- 2.14 The coastline is low lying and the sand dunes act as a natural defence. However, their condition depends on the accumulation of sediment drifting from the north. In recent years, coastal management practices from the Cromer area southwards have affected this movement and sediment deposits have reduced. The main permanent settlement of Winterton lies inland of the dunes and nature conservation area and is primarily designated in flood risk terms as within Zone 1, i.e. with no anticipated flooding. However, the area immediately to the north of the village is designated as a Flood Zone 3 risk, where flooding is 'very probable'.

Policy Framework

Local Plan / Local Development Framework (and related statements)

- 2.15 The 2001 Local Plan states that 'all new housing development should be located, as far as is practicable, close to the main urban areas of Bradwell, Caister, Great Yarmouth and Gorleston'.²⁹ The policy is based on principles of sustainability, with new development primarily located close to major transport routes. In addition, the Plan is concerned to reduce the impact of new development on areas of high landscape value. In the settlement hierarchy Winterton is classed as a 'larger' village.
- 2.16 Policy HOU6 considers the role of larger villages and indicates that new smaller-scale housing developments of 10 dwellings or less can be provided at four locations within Winterton, namely The Loke, Somerton Road, Downing Farm and Empsons Loke. These are essentially windfall developments. Policies HOU7 and HOU8 state that further smaller scale residential development including individual dwellings 'may' be permitted in Winterton within settlement boundaries as long as there is no detrimental impact on the environment and community facilities can cope.

²⁹ See Great Yarmouth Borough Wide local Plan /Adopted Version February 2001, Section 2.3 New housing provision – location of future housing sites, para 2.3.1

2.17 The Local Plan includes a chapter on tourism which outlines the basic strategy and associated policies. The strategy is concerned with enhancing the quality of tourist attractions and facilities; the terms ‘strengthen and diversify’ are quoted several times. In particular there is a desire to promote a wider variety of holidays than the traditional seaside ‘bucket & spade & amusements’ that Great Yarmouth is particularly known for. It is recognised that there are new holiday markets, where quality and variety are increasingly important. Elements of the strategy particularly relevant to Winterton are to:

(C) ‘encourage development in areas away from sensitive locations which are subject to visitor pressure.

(E) maintain strict control on new development in order to conserve and enhance the undeveloped coast, Broads settings, the countryside and historic towns and villages’.

2.18 In para 5.2.7, the Plan states that “*Particular care will be had with regard to proposals for extension of the existing holiday sites bordering the sand dune system at Winterton and especially that area contained within the Norfolk Coast Area of Outstanding Natural Beauty*”. Similarly para 5.3.4 states that “*there is a need to lessen pressure on the Winterton and North Denes dune systems*”.

2.19 However, Winterton is a popular holiday resort with the relatively ‘up market’ non-commercial attractions that the Borough Council is keen to see further developed. Policy TR3 states that:

...new tourist related development will be focused primarily on the existing coastal holiday centres of Great Yarmouth, Gorleston, Hopton, Caister, California, Scratby, Newport, Hemsby and Winterton.

2.20 It can only be assumed that over-development should be avoided and attractions such as fun-fairs restricted to prime commercial holiday areas. Otherwise some conflict could arise from over-use of the dunes area.

2.21 A number of tourism policies deal with the siting of new facilities and changes of use of property which contributes to the tourist industry. It is of interest to note that whereas the policies spell out conditions which prevent development intruding into the landscape and avoiding significant adverse environmental effects, there is no specific reference to avoiding flood risk or coastal erosion. There is, similarly, no reference to flood risk in the Local Plan’s chapter on the Natural Environment.

2.22 The Local Plan was prepared at a time when the then current Shoreline Management Plan for the Borough’s coast is best summarised as ‘*hold the line for the foreseeable future*’. In this context, which basically sought to provide beach and frontage defences along any part of coast with erosion issues, all settlements and property were expected to be defended long-term.

2.23 The proposed planning framework for Winterton is established in the ‘settlement hierarchy’ in Table 2 in the ‘Core Strategy, Vision and Objectives’ of the **Amendment to the Core Strategy Consultation, 2009 (ACSC)**. Most new development is anticipated in Great Yarmouth and Gorleston urban areas. Winterton-on-Sea is designated as a ‘smaller village’. Here :

‘Smaller villages will experience very little development over the Plan period to support small sustainable growth. Small scale development proposals which help to diversify the rural economy... or provide key community facilities will be encouraged. The priorities will be to protect the local character and to support affordable housing, open space, key services and community facilities’.

2.24 Core Policy CS1 – Spatial Strategy spells out Winterton’s role. Only small scale development proposals will be supported which will contribute towards rural diversification, support the viability of existing community facilities and meet identified local needs.

2.25 The Core Policy CS2 on Sustainable Development spells out a number of criteria which should be taken into account where appropriate, such as efficiency in the use of land and reducing the need to travel by car. In relation to Winterton these include:

To conserve and enhance the vitality of biodiversity, wildlife habitats and species and the Norfolk Coast Area of Outstanding Natural Beauty at Winterton-on-Sea.

To take account of the potential impact of climate change.

To minimize the risk of flooding by encouraging the implementation of sustainable drainage systems wherever practicable.

2.26 Core Policy CS9 on Tourism and Culture continues the theme of the 2001 Local Plan in its aim to upgrade and enhance facilities to attract a wider cross section of visitors and extend the season all year round. However the policy seeks to use the overall settlement hierarchy as a framework for any new tourist facilities, which indicates that Winterton will not be a focus for major additional investment.

2.27 In contrast to the 2001 Local Plan, the ACSC discusses flood risk and coastal erosion in considerable detail. The change of emphasis of the latest Shoreline Management Plan (First Review) requires a very different land-use planning response. The strategy of the current SMP is to protect the major coastal settlements and work with natural processes in the context of global climate change rather than to “hold the line” indefinitely. This has the consequence of bringing some properties and other facilities in many smaller coastal settlements under the threat of flooding some time in the period up to 2105. Strategic Objective 9 specifically states:

To manage the borough’s developed and undeveloped coastline in a sustainable way whilst carefully considering the future of coastal settlements...in view of the need to reduce flood and erosion risks.

2.28 Housing and tourism are both discussed in the context of the SMP and the potential loss of property, facilities and infrastructure. Although Winterton Beach Road is not expected to see property loss before 2105, some losses along the coast to the south (between Winterton and Scratby) are forecast. Where coastal communities lose homes and jobs there will be the need to identify suitable locations for replacements and also consider approaches to supporting the very sustainability of the communities in future.

2.29 Core Policy CS11 specifically deals with flood risk and coastal protection. This spells out the ‘sequential and exceptions’ tests’ in the light of PPS25. It states that:

Land will not be allocated for highly vulnerable or more vulnerable uses (including houses) in areas at high risk of flooding³⁰. Proposals should avoid areas at risk of coastal erosion as identified in the SMP Review. Compensatory habitats will need to be provided where existing coastal habitats are affected by coastal erosion.'

- 2.30 The policy means that only land in Flood Zone 1 at Winterton should be considered for future development.
- 2.31 The **Strategic Housing Land Availability Assessment (SHLAA) 2010** has identified just two sites in Winterton which are considered to be deliverable and developable in the period up to 2026, providing approximately 44 dwellings in total. All could be developed in the period 2010-2015. However one of the sites, with capacity for an estimated 29 dwellings, lies in Flood Zone 3a and consequently development would appear to be in conflict with the ACSC.

Sustainable Community Strategy 2008 (SCS)

- 2.32 The overall vision for 2020 is expressed as '*We want our community to offer a high quality of life and a secure future for all our residents*'. That vision is articulated in terms of specific objectives for transport, heritage both built and natural, the economy and the local community. Of specific reference to Winterton, these include:

Wildlife habitats will have continued to be protected, enhanced and managed. Designated wildlife areas and Sites of Special Scientific Interest will be maintained to a high standard.

A range of centres providing all year round holidays, including attractions based on cultural heritage, water and nature themes, sustaining tourism.

Fully developed models of coastal management and flood risk to mitigate the effects of erosion and reduce tidal and fluvial flood risk will have been implemented.

Residents and businesses will have a clear understanding of the causes of climate change and will be taking action to mitigate and adapt to its effects.

- 2.33 There is also a statement to the effect that the Borough's 15 miles of coastline will be protected from further development. The strategy analyses opportunities and identifies what are perceived to be the main challenges and issues still to be addressed if the 2020 vision is to be realised. There is specific reference to the natural environment and coastal areas in particular. The strategy notes that the Shoreline Management Plan Review (then in consultation phase) "*proposes a policy of managed retreat to allow the sea to reclaim parts of the foreshore*". It goes on to state "*but this is not supported locally*". The strategy also reports that the Broads Authority is

Undertaking a widespread flood prevention programme involving the raising and strengthening of river banks and providing water overflow channels, some of which extend into the Borough, to prevent over-topping of the banks in the face of rising sea levels at times of surge tides.

³⁰ An exception relating to Great Yarmouth is discussed below

Strategic Flood Risk Assessment 2009 (SFRA)

- 2.34 The focus of the Great Yarmouth and Gorleston SFRA is the built-up urban area and there is no reference to Winterton. Only very limited development is proposed for Winterton-on-Sea – but the SHLAA suggests it may prove difficult to bring forward sufficient sites without recourse to land that is in a ‘high risk’ Flood Zone.

Shoreline Management Plan (First Review), May 2010

- 2.35 Winterton and its beach are covered by Policy Units 6.13 (Happisburgh to Winterton) and 6.14 (Winterton to Scratby). The SMP (First Review) argues that

Sustainability can be optimised throughout the Eccles to Great Yarmouth section of coast if minimal intervention is practiced. This underpins the long-term Plan for this area. Hard defences of existing positions will prevent the natural movement of sediment and structures will become increasingly difficult to maintain or justify over time as the coastal system retreats. This length of coast relies on sediment eroded from the cliffs of North Norfolk to provide natural defence.

- 2.36 The coast well to the north of Winterton near Happisburgh experienced unacceptably low beaches in the late 1980s and 1990s and beaches were recharged to address the loss; the SMP (First Review) considers that the current scheme will defer further problems for the next 50-100 years. However beyond that time, it may be difficult to sustain such measures. There could be significant problems if the coast around Winterton ultimately receives no natural sediment. The beaches would be significantly depleted and erosion would accelerate. The SMP (First Review) acknowledges that there is a ‘*great deal at stake in terms of communities and land that would be affected should the line not be held*’. For the short and medium term, the preferred policy for the coast north of Winterton Beach Road is to “*hold the line*” – but to monitor the situation in the long term to ensure that it is sustainable to do so. Consequently the long-term option is also to “*hold the line*”, but conditionally; the policy must remain technically, economically and environmentally sustainable.
- 2.37 South of Winterton’s Beach Road, through to Scratby, the coast currently relies on sand dunes for natural defence and as long as a supply of sediment from the north continues it is likely that Winterton Ness and the dunes to the south can be sustained. Consequently the SMP’s approach over the next 100 years is ‘no intervention’. Although the village of Winterton-on-Sea should not be directly affected by flooding under this policy as a full breach in the dunes is considered unlikely, the SMP (First Review) anticipates the loss of seafront properties to the south at Newport and Scratby. At Winterton itself, the reduction in natural sediment supply in the medium term may result in some erosion of the dunes, with the lost sediment replenishing beaches to the south. Consequently the dunes may retreat whilst the beach remains at a similar size to the present. The longer term outlook is for the volume of the dunes to decrease further.

Summary comment and observations on compatibility in Winterton-on-Sea

- 2.38 The 2001 Local Plan designates Winterton-on-Sea as higher up the Borough’s ‘settlement hierarchy’ than the 2009 ACSC – as a ‘large’ as opposed to ‘small’ village. In addition the 2001 Plan appears to be more supportive of the development of additional holiday facilities at

Winterton than the proposed Core Strategy. The Local Plan makes no specific reference to the impact of coastal erosion or flooding on Winterton; the assumption appears to be that coastal defences will be provided to both protect and maintain current beach and dune widths and prevent any breach.

- 2.39 The 2009 ACSC was prepared in a very different environment, with coastal defence issues spelt out in detail. The implications of the SMP (First Review) for coastal property and other facilities are explored. However, in the case of Winterton, it is considered unlikely that there will be any houses lost on Beach Road, the most vulnerable part of the village, before 2105. Further south more substantial losses are expected (these are discussed later in relation to both Hemsby and Caister).
- 2.40 However, there is some slight incongruence between the new coastal defence plans, which basically let nature take its course, and tourism policies which exploit the beautiful coastline as a holiday destination and encourage the nature-loving visitor; Winterton is well-placed to attract tourists and visitors seeking high quality accommodation; there are similarities with villages on the north Norfolk and Suffolk coasts. There is also potential conflict between one 'recommended' development site in the SHLAA and the ACSC as land in Flood Zone 3a is put forward.

Hemsby

History

- 2.41 Hemsby is a large coastal village located five miles to the north of Great Yarmouth with a population of just under 4,600. Its economy is largely based on tourism and there is a significant holiday development off Beach Road, locally known as Hemsby Beach. The adjacent sand dunes are regarded as an important holiday asset; lying between the beach and the village they form a natural barrier and defence. The key purpose of the coastal strip at Hemsby is as a tourist destination, with a number of amusement arcades, pubs and restaurants running down to the coast and beachfront holiday accommodation of chalets and caravan parks. The beach is an important attraction and is easily accessed at this location. Part of the coastal section is called Newport and this adjoins Scratby to the south.
- 2.42 Hemsby was badly affected when Pontins closed its holiday park after the end of the summer 2008 season; it was still vacant in early 2010. Local businesses have approached a 'brand guru' to develop new themes and attractions. Proposals include building on Hemsby's Viking and Scandinavian roots; other ideas include developing a Norfolk 'Eden project' at the derelict Pontins site.
- 2.43 There are no built coastal defences at the Hemsby frontage; the sea dunes in the past have accumulated sediment naturally from north Norfolk. However, apart from the beach and dunes, the main (inland) settlement of Hemsby is designated as Flood Zone 1 with a low risk of flooding.

Policy Framework

Local Plan / Local Development Framework (and related statements)

- 2.44 The **2001 Local Plan** states that ‘all new housing development should be located, as far as is practicable, close to the main urban areas of Bradwell, Caister, Great Yarmouth and Gorleston’.³¹ The policy is based on principles of sustainability, with new development primarily located close to major transport routes. In addition, the Plan is concerned to reduce the impact of new development on areas of high landscape value. Policy HOU4 details the criteria relating to sustainability to be followed in developments consisting of more than 10 dwellings, including:
- Sites should not be subject to coastal (marine) erosion or be subject to flood or be on land of known instability.*
- 2.45 Policy HOU5 lists specific sites where development is anticipated, including Waters Lane in Hemsby, earmarked for around 80 homes. Policy HOU7 allows further residential development within settlement boundaries as long as there is no detrimental impact on the environment and community facilities can cope.
- 2.46 The Local Plan includes a chapter on tourism which outlines the basic strategy and associated policies. The strategy is concerned with enhancing the quality of tourist attractions and facilities; the terms ‘strengthen and diversify’ are quoted several times. In particular there is a desire to promote a wider variety of holidays than the traditional seaside ‘bucket & spade & amusements’ that Great Yarmouth is particularly known for. It is recognised that there are new holiday markets, where quality and variety are increasingly important. In order to promote conservation and to prevent further development impacting directly on the Borough’s most attractive landscape and coast, Policy TR3 focuses new tourist-related development on existing holiday centres, including Hemsby and nearby Newport and Scratby.
- 2.47 However, the Plan recognises that some coastal areas are effectively too popular and are ‘being degraded by over-use’, (para 5.3.4).The problem is considered to be particularly severe at Hemsby: *‘the dune system has been trampled making it more susceptible to erosion and the future well-being of the area has been prejudiced...Positive steps should be taken to improve degraded areas’*. Para 5.4.5 goes on to say *‘there has recently been a proliferation in the number of amusement arcades within the prime holiday commercial areas of Great Yarmouth and Hemsby to the detriment of these areas...The existing provision and distribution is considered adequate for the needs of residents.’* Consequently restrictions on further development are proposed.
- 2.48 New visitor facilities and attractions are permitted at Hemsby, along with the Borough’s other main holiday centres, under Policy TR7, as long as there is no conflict with environmental considerations.
- 2.49 Section 5.12 of the Local Plan is specifically concerned with tourism policies for the Hemsby holiday area. Policy TR25 outlines how the centre of Hemsby holiday township should be developed, emphasising a compact pedestrianised shopping and entertainment centre. No car

³¹ See Great Yarmouth Borough Wide local Plan /Adopted Version February 2001, Section 2.3 New housing provision – location of future housing sites, para 2.3.1

parking provision should be lost and road improvements are sought from the County Council to reduce congestion and improve access to facilities. Many roads are not made up and need improvement. Policy TR26 deals with landscape protection and improvements which are required in the dunes area 'Hemsby Marrams'. To this end it states that no existing holiday bungalows can be extended or replaced and no other inappropriate development will be permitted. Policy TR27 protects the Marrams area from new commercial development that would impact adversely on the natural environment or would be affected by coastal erosion. However, some existing commercial activity may be intensified or temporary uses permitted in the vicinity of 'the Gap', subject to improvements to infrastructure, the landscape and environment. It is also a stated intention of the Borough Council to cover the Marrams and beaches of Hemsby with a bylaw preventing the extraction of sand and gravel to the detriment of the area.

- 2.50 A number of tourism policies deal with the siting of new facilities and changes of use of property which contributes to the tourist industry. It is of interest to note that whereas the policies spell out conditions which prevent development intruding into the landscape and avoid 'significant adverse environmental effects', there is no specific reference to avoiding flood risk and the only reference to coastal erosion relates to commercial activity at Hemsby Marrams. There is, similarly, no reference to flood risk in the Local Plan's chapter on the Natural Environment.
- 2.51 The Local Plan was prepared at a time when the then current Shoreline Management Plan for the Borough's coast is best summarised as '*hold the line for the foreseeable future*'. In this context, which basically sought to provide beach and frontage defences along any part of coast with erosion issues, all settlements and property were expected to be defended long-term.
- 2.52 Hemsby is classified as a 'larger village' in the proposed 'settlement hierarchy' in Table 2 in the 'Core Strategy, Vision and Objectives' of the **Amendment to the Core Strategy Consultation 2009 (ACSC)**. Most new development is anticipated in Great Yarmouth and Gorleston urban areas. The Vision states that by 2021:
- The larger villages of Hemsby, Hopton-on-Sea, Ormesby St Margaret, Martham and Belton will reflect their character and meet the needs of the community, including affordable housing, open space and key services which reflect the key links with the Broads as well as supporting the smaller villages.*
- 2.53 Limited sustainable development will be allowed in order to promote balanced sustainable communities. The levels of services and facilities provided should be appropriate to meet the needs of the community and should not undermine the viability of services in other settlements. Consequently new housing will be permitted provided it is of an appropriate scale. Policy CS1 – Spatial Strategy – anticipates that such development will be primarily on previously developed land. Together with the other four designated 'larger villages', Hemsby will contribute 10-15% of the additional housing requirement for the Borough from 2021 to 2025 and 5% to 10% of employment growth.

- 2.54 The Core Policy CS2 on Sustainable Development spells out a number of criteria which should be taken into account where appropriate, such as efficiency in the use of land and reducing the need to travel by car. In relation to Hemsby these include:

To take account of the potential impact of climate change.

To minimize the risk of flooding by encouraging the implementation of sustainable drainage systems wherever practicable.

- 2.55 Core Policy CS9 on Tourism and Culture continues the theme of the 2001 Local Plan in its aim to upgrade and enhance facilities to attract a wider cross section of visitors and extend the season all year round. The policy seeks to use the overall settlement hierarchy as a framework for any new tourist facilities, which indicates that Hemsby will be a focus for some additional investment. The policy is very much concerned with improving the quality of accommodation and facilities, both existing and new.

- 2.56 In contrast to the 2001 Local Plan, the ACSC discusses flood risk in considerable detail. The change of emphasis of the latest Shoreline Management Plan (First Review) requires a very different land-use planning response. The strategy of the current SMP (First Review) is to protect the major coastal settlements and work with natural processes in the context of global climate change rather than to “hold the line” indefinitely. This has the consequence of bringing some properties and other facilities in many smaller coastal settlements under the threat of flooding some time in the period up to 2105.

- 2.57 Strategic Objective 9 specifically states:

To manage the Borough’s developed and undeveloped coastline in a sustainable way whilst carefully considering the future of coastal settlements...in view of the need to reduce flood and erosion risks.

- 2.58 Housing and tourism are both discussed in the context of the SMP (First Review) and the potential loss of property, facilities and infrastructure. Some losses along the coast to the south of Hemsby, close to Scratby, are forecast. Where coastal communities lose homes and jobs, there will be the need to identify suitable locations for replacements and also to consider approaches to supporting the very sustainability of the communities in future.

- 2.59 Core Policy CS11 specifically deals with flood risk and coastal protection. This spells out the ‘sequential and exceptions’ tests in the light of PPS25. It states that:

Land will not be allocated for highly vulnerable or more vulnerable uses (including houses) in areas at high risk of flooding. Proposals should avoid areas at risk of coastal erosion as identified in the SMP Review. Compensatory habitats will need to be provided where existing coastal habitats are affected by coastal erosion.’

- 2.60 The policy means that only land in Flood Zone 1 at Hemsby should be considered for future development.

- 2.61 The **Strategic Housing Land Availability Assessment (SHLAA)** published in 2010 identifies 10 sites in Hemsby which are considered both deliverable and developable in the period up to 2026. These could accommodate approximately 814 homes, with 574 potentially deliverable in the period 2010 to 2015 and 240 in the period 2015 to 2020. One of these sites

on the west of the village, with capacity for 44 dwellings, lies partly in land designated as Flood Zones 2 and 3a, which is in conflict with the ACSC development policy. It is also of interest that another recommended site is the now-derelict former Pontin's holiday camp. This has capacity for 266 dwellings.

Sustainable Community Strategy 2008 (SCS)

- 2.62 The overall vision for 2020 is expressed as 'We want our community to offer a high quality of life and a secure future for all our residents'. That vision is articulated in terms of specific objectives for transport, heritage both built and natural, the economy and the local community. Of specific reference to Hemsby, these include:

Wildlife habitats will have continued to be protected, enhanced and managed. Designated wildlife areas and Sites of Special Scientific Interest will be maintained to a high standard.

A range of centres providing all year round holidays, including attractions based on cultural heritage, water and nature themes, sustaining tourism.

Fully developed models of coastal management and flood risk to mitigate the effects of erosion and reduce tidal and fluvial flood risk will have been implemented.

Residents and businesses will have a clear understanding of the causes of climate change and will be taking action to mitigate and adapt to its effects.

- 2.63 There is also a statement to the effect that the Borough's 15 miles of coastline will be protected from further development. The strategy analyses opportunities and identifies what are perceived to be the main challenges and issues still to be addressed if the 2020 vision is to be realised. There is specific reference to the natural environment and coastal areas in particular. The strategy notes that the Shoreline Management Plan Review (then in consultation phase) 'proposes a policy of managed retreat to allow the sea to reclaim parts of the foreshore'. It goes on to state 'but this is not supported locally'. The strategy also reports that the Broads Authority is 'undertaking a widespread flood prevention programme involving the raising and strengthening of river banks and providing water overflow channels, some of which extend into the Borough, to prevent over-topping of the banks in the face of rising sea levels at times of surge tides'.

Strategic Flood Risk Assessment

- 2.64 The focus of the Great Yarmouth and Gorleston SFRA is the built-up urban area. Most of the development proposed as 'feasible' for Hemsby in the SHLAA is not in an 'at risk' flood zone and consequently does not require the preparation of a SFRA.

Shoreline Management Plan (First Review), May 2010

- 2.65 The preferred plan for coastal Policy Unit 6.14, which runs from Winterton-on-Sea Beach Road to Scratby and covers Hemsby/Newport, is to take "no active intervention" for the foreseeable future. It is expected that the shoreline will gradually retreat, although there is considerable uncertainty over the rate of progress. Although Winterton-on-Sea is not expected

to be flooded in the period up to 2105, as the dunes of the 'ness' will remain relatively wide and unlikely to experience a breach, the situation is quite different at Newport and Scratby. The dunes could retreat by 10m to 30m within the next 15 years and up to 5 homes could be lost by 2025. It is possible in the short term that a breach could occur at the southern end of Hemsby/Newport, although flooding would probably be restricted to a low-lying area. The beach is likely to remain in a similar condition to the present as it continues to be replenished with sediment from the north Norfolk coast.

- 2.66 In the medium term, there will be a continued loss of dunes, with the entire system between Newport and Scratby potentially disappearing before 2055. This will lead to more frequent flooding of low-lying areas and the sand cliffs affected by sea level rise; the beaches may start to narrow as a consequence. A further retreat of the beach by 35m to 60m is anticipated by 2055. The impact on property becomes more significant as up to 50 homes could be lost. Alongside housing, holiday parks and link roads are also threatened, with a significant impact on the tourist economy.
- 2.67 In the longer term (beyond 2055), the sand cliffs at Newport will continue to be eroded, with flooding of low-lying land. The cliffs will release some sediment but insufficient to prevent a further narrowing of local beaches. By 2105 the net retreat is likely to be between 45m and 100m as compared with today. At the same time further property will be lost. By 2105, a total of 150 properties could be lost, alongside holiday accommodation, tourist facilities and roads. The Hemsby Marrams development is particularly at risk from erosion.

Summary comment and observations on compatibility in Hemsby

- 2.68 The summary of the SMP (First Review) has identified the potential impact of the 'preferred policy' on coastal defence on properties and infrastructure; there will also be impacts on the local economy and consequences in terms of social upheaval. Although most of Hemsby village is not in an 'at risk' flood zone, the holiday accommodation close to the beach is more vulnerable as sea levels rise. Nearby, Newport and Scratby are both significantly more affected.
- 2.69 The 2001 Local Plan clearly regarded Hemsby as a key holiday centre in the Borough; the ACSC appears to be more ambivalent about the village's role, placing less emphasis on promoting further development in the village. However the closure of Pontins, leaving a derelict site, is clearly a major problem for the village's economy and regeneration is an issue. The SHLAA has identified a large number of sites that could be developed for housing, potentially providing for more than 800 dwellings. However, if such development did proceed there would be consequences for the village's facilities which would need to develop in parallel. Sustainability would also be an issue as population growth is likely to outstrip employment; the consequence could well be significant increased out-commuting.
- 2.70 There is also some tension between the SCS and the SMP (First Review) with regard to appropriate policies for coastal defence. Objective 3.7 in the SCS is 'Managing flooding risks and coastal erosion' and the related outcomes are summarized as 'Reducing flooding and coastal erosion'. However the preferred policies of the SMP will result in some increased coastal erosion in areas such as Scratby and Newport, so as to make the defence of Great Yarmouth and Gorleston more certain.

Caister-on-Sea

History

- 2.71 Within the Borough of Great Yarmouth, Caister-on-Sea is the largest coastal settlement outside of Great Yarmouth town and in 2008 had a population of almost 8,900. It lies immediately to the north of Great Yarmouth within easy commuting and visiting distance; there are good bus links. It is a key service centre, with an important range of shopping, services and facilities. The proportion of the population of ‘usual working age’ employed is relatively low at 68%.
- 2.72 The coastline and beaches at Caister-on-Sea are reliant on sediment eroded from the cliffs of north Norfolk. In recent years the natural beach has been supplemented through recharging the beach frontage to overcome a shortfall in natural material supply. The shoreline forms a natural small promontory, Caister Point with a system of dunes, Caister Ness. The beach is currently defended by seawalls, rock reefs/berm and groynes.

Policy Framework

Local Plan / Local Development Framework (and related statements)

- 2.73 The **2001 Local Plan** states that ‘*all new housing development should be located, as far as is practicable, close to the main urban areas of Bradwell, Caister, Great Yarmouth and Gorleston*’.³² The policy is based on principles of sustainability, with new development primarily located close to major transport routes. Development close to main settlements should reduce the impact on areas of high landscape value. Policy HOU4 summarises criteria relating to sustainability for developments of 10 or more dwellings, including:

Sites should not be subject to coastal (marine) erosion or be subject to flood or be on land of known instability.

- 2.74 Policy HOU5 identified two sites in Caister, both off West Road which could collectively accept around 210 dwellings over and above existing allocations. Overall it was expected that new residential development would be within existing settlement boundaries and would not lead to any environmental conflicts; in addition there should be no overloading of the capacity of community facilities. Where pressures created a demand for additional facilities, such as school places, these should be funded by developers through planning contributions.
- 2.75 The Local Plan includes a chapter on tourism which outlines the basic strategy and associated policies. The strategy is concerned with enhancing the quality of tourist attractions and facilities; the terms ‘strengthen and diversify’ are quoted several times. In particular there is a desire to promote a wider variety of holidays than the traditional seaside ‘bucket & spade & amusements’ that Great Yarmouth is particularly known for. It is recognised that there are new holiday markets, where quality and variety are increasingly important. In order to promote conservation and to prevent further development impacting directly on the Borough’s most attractive landscape and coast, Policy TR3 focuses new tourist-related

³² See Great Yarmouth Borough Wide local Plan /Adopted Version February 2001, Section 2.3 New housing provision – location of future housing sites, para 2.3.1

development on existing holiday centres, including Caister. Indeed Policy TR7 recognises Caister-on-Sea as a prime commercial holiday area where new visitor facilities and attractions may be permitted, subject to an assessment of their impact on the landscape, environment, etc.

- 2.76 A number of tourism policies deal with the siting of new facilities and changes of use of property which contributes to the tourist industry. It is of interest to note that whereas the policies spell out conditions which prevent development intruding into the landscape and avoid ‘significant adverse environmental effects’, there is no specific reference to avoiding flood risk or coastal erosion. There is, similarly, no reference to flood risk in the Local Plan’s chapter on the Natural Environment.
- 2.77 The Local Plan was prepared at a time when the then current Shoreline Management Plan for the Borough’s coast is best summarised as ‘hold the line for the foreseeable future’. In this context, which basically sought to provide beach and frontage defences along any part of coast with erosion issues, all settlements and property were expected to be defended long-term.
- 2.78 Caister-on-Sea is defined as a ‘key service centre’ in the Amendment to the Core Strategy Consultation, 2009 (ACSC). The ‘Vision for 2021’ states that growth ‘*will reflect the environmental constraints and the functional ties with Great Yarmouth and Gorleston and provide essential services and facilities to the larger villages by providing local residents with easy access to shopping, employment and services*’. There is good access to jobs in Great Yarmouth by both cycle and public transport. In terms of new housing development in the period 2021-2025, beyond existing allocations, Bradwell and Caister together should account for between 15% and 25% of the total; their share of additional employment will be lower, at 5% to 10%. This reflects Great Yarmouth and Gorleston’s role as a primary employment centre.³³
- 2.79 However, there is, according to the ACSC, ‘*very limited capacity for new housing within Caister-on-Sea*’. The report states that the Strategic Housing Land Availability Assessment will provide further information on potential sites. ‘*The potential...is limited. This is because Caister is constrained by the bypass and landscape quality issues to the west, flood risk zones to the south, coastal erosion and the loss of gaps between settlements of Ormesby St Margaret and Scratby to the north. However the land is capable of being accessible, in highway terms, and is of good building quality.*’
- 2.80 Core Policy CS2 on Sustainable Development requires the following criteria to be taken into account:

Conserve and enhance valued open spaces, the character and quality of local landscapes...

Take account of the potential impact of climate change.

Minimize the risk of flooding.

³³ See Core Policy CS1 – Spatial Strategy

- 2.81 There appears, consequently, to be some conflict between the relatively high position of Caister-on-Sea in the settlement hierarchy and the need to identify land for new housing and issues relating to sustainable development.
- 2.82 Core Policy CS9 on Tourism and Culture continues the theme of the 2001 Local Plan in its aim to upgrade and enhance facilities to attract a wider cross section of visitors and extend the season all year round. The policy seeks to use the overall settlement hierarchy as a framework for any new tourist facilities, which indicates that Caister-on-Sea will be a focus for additional investment. The policy is very much concerned with improving the quality of accommodation and facilities, both existing and new. The ACSC notes that there are likely to be long-term losses of holiday developments due to coastal erosion at Caister-on-Sea after 2055 and ‘future broad locations for replacement’ will need to be identified – on top of growth proposed for the town as a ‘key service centre’.
- 2.83 In contrast to the 2001 Local Plan, the ACSC discusses flood risk in considerable detail. The change of emphasis of the latest Shoreline Management Plan (First Review) requires a very different land-use planning response. The strategy of the current SMP (First Review) is to protect the major coastal settlements and work with natural processes in the context of global climate change rather than to “hold the line” indefinitely. This has the consequence of bringing some properties and other facilities in several coastal settlements under the threat of flooding some time in the period up to 2105.
- 2.84 Strategic Objective 9 specifically states:
- To manage the borough’s developed and undeveloped coastline in a sustainable way whilst carefully considering the future of coastal settlements...in view of the need to reduce flood and erosion risks.*
- 2.85 Housing and tourism are both discussed in the context of the SMP (First Review) and the potential loss of property, facilities and infrastructure. Some losses along the town’s frontage are forecast, probably occurring after 2055. An estimated 50 residential and commercial properties could be lost, together with seafront holiday centres and caravan parks. There are also losses anticipated along the coastline north of Caister, on the stretch to California. If the SMP (First Review) policies are adopted a few seafront properties could go as soon as 2025, with significantly more lost thereafter. In total 130 properties and holiday accommodation could be lost by 2105 along the coastline to the north. Where coastal communities lose homes and jobs there will be the need to identify suitable locations for replacements and also consider approaches to supporting the very sustainability of the communities in future.
- 2.86 Core Policy CS11 specifically deals with flood risk and coastal protection. This spells out the ‘sequential and exceptions’ tests’ in the light of PPS25. It states that:
- Land will not be allocated for highly vulnerable or more vulnerable uses (including houses) in areas at high risk of flooding. Proposals should avoid areas at risk of coastal erosion as identified in the SMP Review. Compensatory habitats will need to be provided where existing coastal habitats are affected by coastal erosion.’*
- 2.87 The policy means that only land in Flood Zone 1 at Caister-on-Sea should be considered for future development.

- 2.88 The **Strategic Housing Land Availability Assessment (SHLAA)** published in 2010 identifies two sites which are considered both deliverable and developable in Caister-on-Sea in the period up to 2025. Together these sites could accommodate 59 dwellings; both are capable of being developed in the period 2010 to 2015. Neither are in ‘at risk’ Flood Zones.

Sustainable Community Strategy 2008 (SCS)

- 2.89 The overall vision for 2020 is expressed as ‘We want our community to offer a high quality of life and a secure future for all our residents’. That vision is articulated in terms of specific objectives for transport, heritage both built and natural, the economy and the local community. Of specific reference to Caister, these include:

Wildlife habitats will have continued to be protected, enhanced and managed. Designated wildlife areas and Sites of Special Scientific Interest will be maintained to a high standard.

A range of centres providing all year round holidays, including attractions based on cultural heritage, water and nature themes, sustaining tourism.

Fully developed models of coastal management and flood risk to mitigate the effects of erosion and reduce tidal and fluvial flood risk will have been implemented.

Residents and businesses will have a clear understanding of the causes of climate change and will be taking action to mitigate and adapt to its effects.

- 2.90 There is also a statement to the effect that the Borough’s 15 miles of coastline will be protected from further development. The strategy analyses opportunities and identifies what are perceived to be the main challenges and issues still to be addressed if the 2020 vision is to be realised. There is specific reference to the natural environment and coastal areas in particular. The strategy notes that the Shoreline Management Plan Review (then in consultation phase) ‘proposes a policy of managed retreat to allow the sea to reclaim parts of the foreshore’. It goes on to state ‘but this is not supported locally’. The strategy also reports that the Broads Authority is ‘undertaking a widespread flood prevention programme involving the raising and strengthening of river banks and providing water overflow channels, some of which extend into the Borough, to prevent over-topping of the banks in the face of rising sea levels at times of surge tides’.

Strategic Flood Risk Assessment

- 2.91 The focus of the Great Yarmouth and Gorleston SFRA is the built-up urban area. Caister-on-Sea is generally restricted in terms of future development because land to the south of the town is in an ‘at risk’ flood zone.

Shoreline Management Plan (First Review), May 2010

- 2.92 The shoreline immediately to the north of Caister-on-Sea is covered by Policy Unit 6.15 (California to Caister) and the town itself is covered by Unit 6.16, Caister-on-Sea. The preferred policies for management are closely tied to proposals for Great Yarmouth itself. The SMP (First Review) acknowledges that Great Yarmouth is the major economic centre and its

location ‘justifies full protection against erosion or flooding. This needs to be reflected by adopting complementary policy options for the presently defended areas of California and Caister. Whilst these locations will continue to be defended for some time, if this continues into the long-term, these would become very pronounced, potentially interrupting sediment transport to Great Yarmouth and beyond, and indeed the rest of Caister itself. Therefore the longer-term plan needs to allow for some realignment of the shoreline to take place northwards from Caister Point to enable improved material movement along this coastline’. The SMP (First Review) states that the result will be the protection not only of Great Yarmouth but also of most of Caister.

- 2.93 If defences were to be maintained on current lines at Caister in the long-term the shoreline would evolve by way of an increasingly pronounced promontory; this would prevent the transport of sediment to settlements to the south – and notably to Great Yarmouth/Gorleston.
- 2.94 For the California to Caister coast (Unit 6.15) the policy for the short term to 2025 is “*hold the line*”. However in the medium term the rock bund will deteriorate in condition and become more detached from the cliffs as erosion continues; by 2055 the shoreline may have retreated by 30m to 50m, with the increased sediment helping to maintain beaches both here and further south. With the rise in the sea level the rock reefs will become less effective; this could result in beach loss behind them and also increased exposure of the seawall which in turn might fail. The preferred policy for this period is to allow shoreline retreat through managed realignment. If the seawall fails the realignment could be as much as 40m to 50m. The long term policy is similarly one of managed realignment to allow for shoreline retreat. Cliff erosion rates will increase after the seawall fails, although a healthy beach is expected to develop in a retreated position. The reefs and groynes will be ineffective due to shoreline retreat and increased throughput of sediment along the coast is anticipated.
- 2.95 Significant numbers of seafront properties and holiday accommodation look set to be lost, as well as the Scratby to California link road.
- 2.96 For Caister-on-Sea itself (Unit 6.16), the preferred policy for both the short and medium term is “*hold the line*”, involving maintenance and, if required, replacement of existing seawalls, rock reefs and groynes. In the short term there could be fluctuations in the width of the dunes and beach, due to natural changes to Caister Ness. Sediment transport will be affected by the reefs and groynes but should be adequate to maintain beaches at current levels. In the medium term the impact of a rising sea level is likely to be a narrower beach and some dune erosion. The most northern section is most at risk of a seawall breach, where the beach is particularly narrow. Further south the dunes are wider and, even if eroded, should prevent a breach; consequently the shoreline position will be maintained by the seawall.
- 2.97 In the longer term the preferred policy for the Caister frontage is to allow shoreline retreat through managed realignment. Beyond 2055 there will continue to be dune erosion, so exposing the sea wall. However, this is expected to be effective through to around 2075. It may be necessary to construct a flood defence at the golf course at the southern end of this stretch. Towards the end of the period an exposed seawall is likely to fail. The seawall generally fronts dunes with rising ground behind. Breaches could result in the shoreline retreating by 80m to 110m, with sediment eroded being moved south.

- 2.98 In terms of impact on property there should be no loss of homes or holiday accommodation in the short to medium term. However, after 2055 with a breach in the seawall and shoreline retreat up to 50 homes and commercial buildings could be lost, together with holiday accommodation such as caravan parks and chalets.

Summary comment and observations on compatibility in Caister

- 2.99 There appear to be two issues of potential conflict. The first relates to the proposed settlement hierarchy. Caister is identified as one of two ‘key service centres’ in the Borough, which involves significant growth in housing and also jobs in the period through to 2025. However, the ACSC acknowledges that it is proving difficult to identify suitable land for growth and the SHLAA has identified only two sites with potential for new housing, limited to 59 dwellings in total. And, in addition to building for ‘new’ growth, there is the longer-term (probably post 2055) need to provide replacements for permanent and temporary properties and facilities lost due to coastal erosion. As all new dwellings will have to pass the ‘test’ of sustainable development and will need to be built on land classified as ‘low flood risk’, it may prove impossible to ‘square the circle’.
- 2.100 The second conflict is between the ACSC tourism policy, which suggests significant investment in new tourist facilities at Caister-on-Sea, and the likely loss of beach and holiday accommodation. As the policy stands there is an expectation that investment will be in both additional and new holiday facilities and accommodation, all built to improved quality standards. Investment in the short-term (up to 2025) may prove unsuitably located and indeed vulnerable in the long-term.
- 2.101 There is also some tension between the SCS and the draft SMP, (produced in 2006), with regard to appropriate policies for coastal defence. The SMP (First Review) was amended, particularly with respect to policies for the short-term (through to 2025). Where the initial consultation had proposed ‘managed realignment of hard defences’, this was postponed in the 2010 Plan, with “*hold the line*” the now preferred short-term option. This provides a breathing space and the opportunity to develop adaptive and ameliorative responses to the loss of property and infrastructure.
- 2.102 However, this does not resolve all conflict between the SCS and the ‘final’ SMP (First Review) with regard to appropriate policies for coastal defence. Objective 3.7 in the SCS is ‘Managing flooding risks and coastal erosion’ and the related outcomes are summarized as ‘Reducing flooding and coastal erosion’. In contrast the preferred policies of the SMP (First Review) could result in some increased coastal erosion in areas such as north Caister, so as to make the long-term defence of Great Yarmouth and Gorleston more certain.

Great Yarmouth & Gorleston-on-Sea

History

- 2.103 Great Yarmouth and Gorleston, which lies to the south, have a combined population of around 58,900. They form the main urban settlement in the Borough. Great Yarmouth developed initially on a spit between the coast and the estuary of the River Yare. Gorleston

developed later to the south of the estuary. Great Yarmouth is the principal centre for services, retailing and employment and facilities include a recently expanded port constructed in the Outer Harbour, capable of taking larger ships and ‘ro-ro’ traffic. Tourism accounts for a major share of the economy – suffering in recent years as traditional staying holiday-makers have been replaced by day visitors. Many holiday facilities and infrastructure are out-dated and of low quality and the range is limited.

- 2.104 As much employment is seasonal and relatively unskilled, the town has a generally low wage economy. There is a low employment rate (under 65% of the working age population) and also high unemployment; many residents are dependent on benefits. The Index of Multiple Deprivation (IMD) for 2007 places Great Yarmouth in the top 25% of deprived areas of England. Regeneration is considered to be a priority for the town and over recent years, 1st East has spear-headed physical redevelopment as the Urban Regeneration Company established to help tackle the issue³⁴.
- 2.105 In recent years significant investment has been directed at Great Yarmouth from EEDA and other sources such as CLG’s Working Neighbourhoods Fund. Interventions have been focused around cultural and historic regeneration of the medieval town buildings alongside community participation and empowerment. Employment growth has been targeted with development of the Outer Harbour.
- 2.106 The beach at Great Yarmouth is very wide and described as ‘healthy’, supplied by sediment from erosion along the cliffs further north. The North Dunes are internationally designated for the habitats they support and their physical characteristics. The beach is expected to provide good protection, without the need for physical intervention, even taking into account the anticipated rise in sea levels. However the continued transfer of sediment long-term to Great Yarmouth is dependent on the loss of defences further north. Basically the maintenance of Great Yarmouth’s beach requires managed realignment of the stretch of coast to the north of the town.
- 2.107 Great Yarmouth is vulnerable to flooding not only along the town’s coastal frontage but also inland. Much of the land is designated as ‘flood zone 3’. This creates major problems for new and re-development.

Policy Framework

Local Plan / Local Development Framework (and related statements)

- 2.108 The **2001 Local Plan** states that ‘all new housing development should be located, as far as is practicable, close to the main urban areas of Bradwell, Caister, Great Yarmouth and Gorleston’.³⁵ The policy is based on principles of sustainability, with new development primarily located close to major transport routes and employment opportunities.

³⁴ 1st East ceased operations in March 2011 but a new organisation – the Norfolk Development Company – should act as a successor body

³⁵ See Great Yarmouth Borough Wide local Plan /Adopted Version February 2001, Section 2.3 New housing provision – location of future housing sites, para 2.3.1

- 2.109 Along with other settlements where more than 10 dwellings are proposed, Policy HOU4 states the sustainability criteria which are to be complied with, including:

Sites should not be subject to coastal (marine) erosion or be subject to flood or be on land of known instability.

- 2.110 The strategy and related policies on tourism are primarily concerned with developing the industry by improving quality and coverage of the current 'offer'. The aim is to provide a wide range of both accommodation and facilities and seek to extend the season all year round. Recognising the value of the undeveloped coast and countryside, especially the Broads, Policy TR3 steers new tourist-related development primarily to the existing holiday centres, including both Great Yarmouth and Gorleston. To conserve tourist resources, policies prevent the change of use of existing tourist facilities to other purposes within primary holiday attraction areas. Proposals for new visitor attractions and facilities may be permitted here, depending on factors such as design and impact on the environment, traffic, etc.
- 2.111 In some parts of Great Yarmouth there has been excessive development of amusement arcades and new developments will be strictly limited; no further provision should be allowed in Goleston in order to protect its 'sedate and relatively uncommercialised character'.³⁶
- 2.112 A number of tourism policies specifically relate to Great Yarmouth and to Gorleston. In the case of Great Yarmouth, the aim of Policy TR21 is to 'maintain and enhance the status of Great Yarmouth's 'Golden Mile' – the seafront between Euston Road and the Pleasure Beach'. This is regarded as the main focus of the borough's traditional tourist industry. It is considered important to protect the more open character of other areas of the seafront. No buildings will be allowed on the existing public gardens and recreational open spaces. It is considered important to retain the racecourse and resist redevelopment proposals.
- 2.113 Gorleston-on-Sea has traditionally developed as a holiday resort for the 'more discerning holidaymaker'. However, in recent years the commercial centre has become noisier, especially at night, to the detriment of the town's ambience. The over-riding aim of policy TR24 is to preserve the tranquil character of the area by resisting development that is out of keeping with the settlement.
- 2.114 The Local Plan was prepared at a time when the policy of the then current Shoreline Management Plan for the Borough's entire coastline is best summarised as 'hold the line for the foreseeable future'. In this context, which basically sought to provide beach and frontage defences along any part of coast with erosion issues, all settlements and property were expected to be defended long-term.
- 2.115 The vision for the urban area of Great Yarmouth and Gorleston is outlined in the Amendment to the Core Strategy Consultation 2009 (ACSC) 'Vision 2021' as follows:

The area will be the cultural and economic heart of the borough, reflecting the spatial planning priorities for urban renaissance and regeneration and the need to tackle high levels of unemployment and deprivation. New affordable housing, cultural, retail, leisure, employment, open space, community facilities and mixed use developments on previously developed riverside land will be delivered through

³⁶ Para 5.4.5 of Chapter 5: Tourism

comprehensive regeneration. The main areas being regenerated are the town centre and the surrounding urban waterfront areas. Active programmes...both physical and social, will see the well-designed sustainable waterfront redevelopment of Cobholm, North Quay, Southtown, South Denes and Runham Vauxhall. ..This will create a radical change to the economic structure and provide sustainable links to the waterfront, town centre, the Broads, seafront and surrounding settlements.

- 2.116 Between 60% and 70% of the additional new homes planned by 2025 will be in the two ‘Main Towns’³⁷, alongside almost 40 hectares of business and general industry land for employment and both leisure and retail developments. Comprehensive regeneration and renaissance is identified as a strategic objective for the plan. This means that the majority of development will be focused on previously developed ‘brownfield’ land in the town centre and the surrounding urban waterfront areas. Gorleston will improve its shopping and continue to support its catchment area.
- 2.117 In general terms the strategic objectives of the consultation CS follow on from the 2001 Local Plan as far as Great Yarmouth and Gorleston are concerned. In tourism terms the focus is on retaining and improving facilities, increasing choice. There is more emphasis on recognising the impact of climate change and vulnerability. Strategic Objective 9 specifically states:

To guide changes in the built and natural environment in a way that takes account of climate change and the vulnerability to climate change. To manage the borough’s developed and undeveloped coastline in a sustainable way whilst carefully considering the future of coastal settlements...in view of the need to reduce flood and erosion risks.

- 2.118 Core Policy CS4 specifically deals with regeneration and renaissance in Great Yarmouth and Gorleston. This refers to the Urban Regeneration Company Area Action Plan, which aims to provide for 2,000 dwellings and 20,000 square metres of retail and leisure uses. Key objectives are to improve design standards, create attractive gateways to the borough, improve the character and identity of the river frontages and generate economic and social activity. The policy proposes key themes for each of the 5 regeneration areas:
- Bure House Quay (Cobholm): mixed use, mainly residential * top priority
 - North Quay: mixed use, mainly retail with residential and reconnecting the town centre to the waterfront * top priority
 - Ice House Quay (Southtown): mixed use, mainly residential with commercial uses at ground floor level * top priority
 - South Denes: mixed use, mainly employment with a third river crossing
 - Runham Vauxhall: mixed use, mainly tourism. New broad area with leisure & tourist development.

³⁷ As defined in the settlement hierarchy

- 2.119 Although identified as the location for most of the Borough's proposed new housing development, the Consultation acknowledges that there is a problem due to limited capacity for new housing on previously developed land within Great Yarmouth and Gorleston. As with Caister, the Consultation proposed that a Strategic Housing Land Availability Assessment would provide further information on potential sites and capacity within the two towns. It is impossible to increase capacity by way of a greenfield extension due to constraints such as flood risk, coastal erosion and the loss of gaps between settlements – Caister to the north and Hopton to the south.
- 2.120 Core Policy CS9 covers tourism and culture. It is generally consistent with the approach of the 2001 Local Plan, supporting the upgrading and enhancement of existing accommodation and attractions to win back lost business³⁸. The location of new tourist facilities should follow the Settlement Hierarchy as the main guide – with Great Yarmouth and Gorleston consequently benefitting. Tourism development should avoid adverse impacts on the natural and built environment, especially areas designated for conservation. The policy aims to protect Great Yarmouth's main tourist attractions of the Golden Mile and the Racecourse; Gorleston will be promoted for quieter holidays. In order to extend the range of facilities, Great Yarmouth is put forward as an appropriate location for a large casino complex as long as this is well related to existing tourist attractions and facilities. The traditional visitor has not been high-spending and this has 'stifled strong investment'. Hence there is a strong desire to bring in new consumers.
- 2.121 Core Policy CS11 specifically deals with flood risk and coastal protection. This spells out the 'sequential and exceptions' tests' in the light of PPS25. It states that:
- Land will not be allocated for highly vulnerable and more vulnerable uses (including housing) in areas at high risk of flooding. The only exception is within the Urban Regeneration Company (URC) Area when the development contributes to the objectives in the URC Area Action Plan and appropriate land at lower risk is not available; there are exceptional reasons for locating development in such areas; and the risk can be fully mitigated by engineering and design measures.*
- 2.122 Development proposals must not increase the risk of flooding on or off site and should avoid areas at risk if coastal erosion as identified in the Shoreline Management Plan.
- 2.123 The ACSC argues that development on land designated as Flood Zones 2 and 3a (with a medium to high risk of flooding) is necessary in Great Yarmouth and Gorleston because there is no other land available. Some continuing development is necessary for 'wider sustainable development reasons'. It 'takes into account the need to avoid social or economic blight and the need for essential civil infrastructure to remain operational during floods.' The URC Area Action Plan provides the framework to guide this development (see below). Excluding 'flood risk' areas would damage regeneration. Having judged that regeneration outweighs, on balance, flood risks, it is still necessary to 'flood-proof' redevelopment in line with the 'exceptions test' of PPS25. Consequently development:

³⁸ In the 1970s visitor numbers peaked at 9 million tourist nights, falling to just under 7 million in the early 1990s and just over 5 million by 2003.

Will only be permitted where a detailed flood risk assessment is prepared, which clearly demonstrates that the development is appropriate in terms of its type, siting and the mitigation measures proposed, including where necessary enhancement of flood defences and/or effective sustainable drainage measures.

- 2.124 Consultation with the Environment Agency will be necessary to agree mitigation measures, prior to securing these through the use of planning agreements. Development proposals must not compromise the town's flood defences. Therefore new development plans must take on board the measures included in the Great Yarmouth Flood Defence Strategy, together with recommended improvement works.
- 2.125 The **Strategic Housing Land Availability Assessment (SHLAA)** published in 2010 identifies 8 sites in Gorleston and 9 sites in Great Yarmouth which are considered to be both deliverable and developable by 2025. The Gorleston sites can accommodate 1,287 dwellings; of these 356 could be developed in the period 2010 to 2015, 612 could be developed between 2015 and 2020 and 302 could only be provided after 2020. The Great Yarmouth sites have capacity for an estimated 1,109 dwellings. A relatively low 187 are considered feasible in the period 2010 to 2015, with a further 722 possible between 2015 and 2020. The final 200 cannot be provided before 2020.
- 2.126 The sites include the previously developed regeneration land covered by the Great Yarmouth Waterfront Area Action Plan, (see below). The detailed site descriptions point to high costs of development. They include decontamination of land, the relocation of hazardous installations and investment in additional flood defences.
- 2.127 Together Great Yarmouth and Gorleston are judged to have the capacity for just under 2,400 dwellings on 'developable' sites over the next fifteen years. This is 29% of a grand total of 8,414 homes identified as possible in the borough as a whole. This appears to be a very much lower percentage of the Borough's total housing development than the Core Strategy recommends – (i.e. between 60% and 70% of the total).

Great Yarmouth Waterfront Area Action Plan (GYWAAP) – consultation; 2010

- 2.128 The GYWAAP was published for public consultation in November 2010, prior to review and submission in summer 2011 to independent examination by a Planning Inspector³⁹. The 'vision' is:

'To facilitate the comprehensive regeneration of Great Yarmouth's historic quaysides and provide improved linkages between the town centre and its riverfront which for many years has been subject to industrial decline and underutilisation'.

- 2.129 The Plan includes proposals for around 1,000 dwellings, 16,500 sq m of employment land, 14,200 sq m of retail and leisure uses, improvements to the public realm and station and improved flood defences. There will be improved access to the waterfront with dedicated walkways. The Plan identifies a number of strategic infrastructure requirements, including transport and flood defence measures. The likely cost of these works, together with demolition and construction, is likely to be very high.

³⁹ Prepared by Great Yarmouth Borough Council and 1st East Urban Regeneration Company, November 2010

Sustainable Community Strategy 2008 (SCS)

- 2.130 The overall vision for 2020 is expressed as ‘We want our community to offer a high quality of life and a secure future for all our residents’. That vision is articulated in terms of specific objectives for transport, heritage both built and natural, the economy and the local community. Of specific reference to the coastline at Great Yarmouth/Gorleston, these include:
- wildlife habitats will have continued to be protected, enhanced and managed. Designated wildlife areas and Sites of Special Scientific Interest will be maintained to a high standard
 - a new high quality and family oriented seafront with a 4-star hotel and other year-round tourist facilities developed to maintain the vitality of Great Yarmouth as a tourist attraction. Repairs to Victorian and Edwardian seafront buildings, piers, Winter Gardens and Jetty
 - modernisation of older terraced homes suffering from dampness, structural problems and lack of maintenance – some still showing signs of damage from the 1953 tidal floods
 - new homes built alongside the waterfront together with a mixed range of services and leisure provision
 - fully developed models of coastal management and flood risk to mitigate the effects of erosion and reduce tidal and fluvial flood risk will have been implemented
 - residents and businesses will have a clear understanding of the causes of climate change and will be taking action to mitigate and adapt to its effects
 - a fully developed Outer Harbour (EastPort) and a container-handling facility; adjacent land at South Denes will be refurbished to allow business and employment expansion. This will be supported by a multi-modal freight facility
 - Great Yarmouth to be a strategic hub for a short-sea freight and passenger corridor with well-developed logistical cross-country and overseas links.
- 2.131 There is also a statement to the effect that the Borough’s 15 miles of coastline will be protected from further development. The strategy analyses opportunities and identifies what are perceived to be the main challenges and issues still to be addressed if the 2020 vision is to be realised. There is specific reference to the natural environment and coastal areas in particular. The strategy notes that the Shoreline Management Plan Review (then in consultation phase) ‘proposes a policy of managed retreat to allow the sea to reclaim parts of the foreshore’. It goes on to state ‘but this is not supported locally’.
- 2.132 The strategy also reports that the Broads Authority is ‘undertaking a widespread flood prevention programme involving the raising and strengthening of river banks and providing water overflow channels, some of which extend into the Borough, to prevent over-topping of the banks in the face of rising sea levels at times of surge tides’. This is particularly critical for both Great Yarmouth and Gorleston, situated on the estuary of three of Norfolk’s principal rivers. Reference is made to the need for a barrier to prevent the inflow of salt water at times

of especially high tides; it is suggested that further consideration is required. There is a request for 'greater investment and better co-operation between the various agencies responsible for flood protection measures' as the number of properties and amount of land at risk of flooding increases.

Strategic Flood Risk Assessment (SFRA)

- 2.133 The focus of the Great Yarmouth and Gorleston SFRA is the built-up urban area. The towns are located next to the Norfolk Broads, with a number of water courses flowing through the Great Yarmouth and Gorleston areas meeting the Inner Harbour. The rivers Yare, Waveney and Bure, together with Breydon Water, are all embanked or defended in their lower stretches.
- 2.134 Great Yarmouth, due to its location on the North Sea coast and at the mouth of the River Yare, is at risk of river, tidal and sea flooding. Tidal flooding is caused by storm surges and can result in defence overtopping and breach scenarios. It is considered to be the most significant source of flooding for the town – although the risk of surface water flooding is also considered to be high. The consequences of surface water flooding are not considered to be as bad as tidal flooding – but are more likely to occur⁴⁰. River flooding risks are lower. Tidal flooding risks will increase as sea levels rise.

Shoreline Management Plan (First Review), May 2010

- 2.135 The SMP (First Review) records that Unit 6.17, Great Yarmouth, is defended primarily by a very wide beach which is expected to provide ample protection for the town except at the north and south extremities for the foreseeable future. However, this situation requires a continuing supply of sediment from northeast Norfolk coasts. If this is not maintained then there could be accelerated erosion. Due to the large community, its asset base and potentially high socio-economic losses, major defence works could be required in future. However, in order to maintain the current sediment movement, complementary measures are required to the north affecting the presently defended coastlines at California and Caister. The SMP (First Review) argues that if defences to the north were supported long-term then there would need to be further works which could potentially interrupt the sediment transport to Great Yarmouth and beyond. The advice is that over a 100 year period, some realignment of the coastline is required north of the main urban area if the assets of Great Yarmouth are to be protected.
- 2.136 Unit 6.18 covers the coastline at Gorleston-Sea. It is set back from the coastline to the north as Great Yarmouth was built on a former spit. Gorleston is not interrupting the transport of any sediment travelling south as it bypasses the harbour. However the construction of the Outer Harbour may potentially alter sediment movement and this could affect the shoreline to the south; the situation is being closely monitored. If significant impacts arise then the Port Authority will be required to provide mitigation. As Gorleston is of high value economically it is possible that long-term protection might be most sustainable if supported by some sediment input, achieved through erosion to the south.

⁴⁰ A Surface Water Management Plan (SWMP) is under development

2.137 The preferred policy in the SMP (First Review) for both Great Yarmouth and Gorleston over all three time periods is to “*hold the line*”. To the immediate south of Gorleston the preferred policy is “*no active intervention*”; this is likely to result in the gradual loss of parts of the golf course. The reason for this policy is to provide sediment feed to adjacent coastal frontages.

Summary comment and observations on compatibility in Great Yarmouth (and Gorleston)

2.138 The SMP (First Review) recognises that the socio-economic and ‘community’ value of the urban area of Great Yarmouth and Gorleston must be protected by flood and coastal defences for the foreseeable future. As long as redevelopment of land in ‘high risk’ Flood Zones follows the PPS25 guidance, ensuring that such risks are mitigated as far as possible, there is acceptance that investment in housing, employment, community facilities and leisure will occur.

2.139 The main issues appear to be that:

- even after exploring development possibilities on all potential sites, including those in Flood Zones 2 and 3a, the total number of dwellings that can be built in the next 15 years falls short of the Borough’s target
- many of the sites in the Waterfront regeneration area are likely to be very expensive to develop
- the cut-backs in public sector investment expected in the next few years are likely to impact on regeneration programmes as capital investment will be reduced
- any development which does proceed is likely to involve sites with few constraints. However, without employment growth the stimulus for new housing may be low throughout Great Yarmouth.

2.140 The Sustainable Community Strategy outlines comprehensive programmes for regeneration in Great Yarmouth but its objectives may well now be stymied by the lack of public funds to support the investment required to achieve significant improvements in housing, transport facilities and the environment. The accompanying programmes for neighbourhood and community development may also be adversely affected by cuts in central government grants to district councils. Great Yarmouth BC is set to experience some of the largest percentage cuts to its grant of any district council in both 2011/12 and in 2012/13.