

Reference: 06/15/0549/F

Parish: Hopton on Sea

Officer: D Minns

Expiry Date: 21-01-2016

Applicant: Potters Leisure Resort

Proposal: Proposed Coastal Protection Scheme

Site: Hopton Beach (Adj to Potters Leisure) Coast Road

REPORT

1. Background / History :-

1.1 This is full planning application accompanied by an Environmental Statement to construct a coastal protection scheme at Hopton-on-Sea. Located approximately 4.5km south of Great Yarmouth, the beach at Potters Leisure runs for approximately 0.5km within the stretch of shoreline from Gorleston from the north to near Corton to the south close to the border of Great Yarmouth and Waveney Borough/District Councils.

1.2 Members will be familiar with the fact that this was once a wide sandy beach which has been subject to significant erosion in recent years. As a consequence the present coastal defences are being degraded and without protection of the sandy beach the existing sea wall is at risk of being undermined with eventual collapse resulting in erosion of the soft cliffs behind and the eventual loss of hinterland.

1.3 The propose of the scheme is to halt erosion of the cliff and protect Potters Leisure Village which is located on the cliff immediately landward of the beach.

1.4 The beach is publically accessible from Potters Leisure Escort (owned and operated by Potters Leisure Ltd) set on the approximately 8m to 15m high sandy cliffs located immediately landward of the sea with convenient access to the beach for guests. Potters Resort was established in 1920 and has been on the site since the 1930's.

1.5 The complex comprises of a substantial hotel development and mixture of chalets with an extensive of high quality sporting and leisure facilities. Currently the site accommodates 800 resident guests all year round

1.6 Historically the beach was protected by two main man - made features which as outlined above are in a poor state of repair and are ineffective at protecting the landward cliff and attendant Leisure Resort namely:

- 1) Five wooden groynes;
- 2) An existing concrete sea wall running parallel to the cliff with a steel sheet pile toe to the beach which has been exposed due to the depletion of the sand. The sea wall and steel toe provide protection to the cliffs from wave action during storms around high tide.

1.7 Due to recent coastal erosion taking place along Hopton Beach, which has caused severe depletion of the beach itself and exposed the sheet pile toe to the existing sea wall the scheme proposals to help protect the toe of the sea wall and to stabilise the beach at this location. By implementing the scheme, it is anticipated a satisfactory level of protection will be restored to the coast, managing the erosion that it is currently effecting it and thereby protecting Potters Leisure which is located on the cliff top.

1.8 It is predicted that if the currently experienced level of erosion is allowed to continue without any mitigation then the shoreline will relocate around 50m to landward of present over next 20 years.

1.9 The severe coastal erosion experienced at the site is of concern on a number of levels, including: degradation of the coast's recreational and visual attractiveness; safety of beach users and of guests of Hopton Holiday Village; severance of beach access; economic impacts to local businesses in an area largely dependent on tourism; and long-term concerns over the threat to the village itself and associated infrastructure.

1.10 The scheme will be entirely financed by applicant's Potters Leisure Limited (the owners of the holiday village) with no impact on the public purse.

1.11 In January 2014 planning permission was granted for a similar privately financed scheme to that proposed for the stretch of Hopton Beach below the Hopton Holiday Village owned by Bourne Leisure. Construction works are now complete. The proposal for the Coastal defence to Hopton Beach below Potters Leisure will be contiguous with the completed Bourne Leisure coastal defences.

2.0 The Proposal

2.1 The proposed scheme will consist of two main features;
a) a linear rock protection to the toe of the sea wall and
b) rock groynes

2.2 A 500m long rock protection to the sea wall will be placed along the toe of the sea wall against the vertical sheet piled in front of Potters Leisure. This structure will be approximately 6.0m wide with a 1:2 gradient from beach to sea wall. The top of the rocks will be at a level 0.5 to 1.0m above the existing concrete sea wall promenade. The rocks will be located on smaller rocks to facilitate access underlain by a heavy duty filter cloth where required. The final toe depth will accommodate up to 1.0m of beach erosion with the final toe depth varying along the frontage. Any

displaced sand will be used will be used within the scheme and no spoil/sand will be transported to or from the site.

2.3 In terms of the rock groynes, four are proposed to be constructed over a 500m stretch of coastline immediately in front of Potters Leisure and the linear rock toe protection described above. The groynes are to be placed at around 100m intervals and approximately 50m in length jutting out in to the North Sea from the base of the linear toe protection.

2.4 The groynes would be constructed of similar sized rock armour to the toe protection to the sea wall. The groynes will be set at levels to keep the the strong tidal flows offshore across the extremities and to control wave interaction with the structures to minimise disturbance to any beach deposits which may accrete in the more sheltered embayments between the groynes.

2.5 One of the four groynes constructed will be utilised to provide a quay facility with a concrete access walkway top the top of the groynes. The proposed access walkway to the top of the groynes would gated and not accessible to the general public for safety reasons. The upper parts of the groynes will be located in the inter-tidal zone(i.e between High Water (HW) and Low water whilst the seaward end will be located below the low water mark. It is possible that additional protection maybe required on thje adjacent beach to the south side of the groynes and on-going coastal processes modelling will confirm whether such mitigation would be required and if so its form and scale.

2.6 The construction phase is once the appropriate approvals have been obtained is considered by the applicants approximately 6months to complete and will be staged to minimise exposure risks between removal of the old and construction of the new defences. Normal working hours will be Monday to Friday 07:30 – 17:00 and Saturdays 08:00 – 1300 with no working on Sundays or Bank Holidays, unless there is an emergency.

2.7 However, it is recognised that the rock dumping from the barge is tidally dependant and some, infrequent working outside of these hours may be required in to the evening in front of Potters Holiday Village (not residential properties), although no night time work is anticipated (e.g. 22:00 to 05:00). Any working outside of normal working hours will be agreed in advance with Councils Environmental Heath Officers.

2.8 The historical, wooden defences will be removed using land based plant and the large rock deliveries from Scandinavia will be brought to the beach by flat topped barge where they will be deposited in 'dump zones' and moved in to location by plant operating on the beach.

2.9The applicants propose that three site compounds will be established: in Potters Leisure Resort car park (workers car park, general storage and workshop); off Beach Road on the field owned by Potters Leisure Resort, Potters Leisure field just off Beach Road and as previously used when the Bourne Leisure protection works were undertaken. There may, on occasion, be the need to bring in smaller stone, terram and other similar materials and any such deliveries will be made to Potters Leisure Resort car park and transferred to the site compound using dumper trucks along Beach Road.

2.10 All construction will be carried out in line with good industry practice and a Construction Environmental Management Plan (CEMP) will be prepared and approved prior to commencement of construction.

2.11 Potters Leisure has undertaken an Environmental Impact Assessment (EIA) for the scheme, to ensure that no unacceptable, adverse effects result to the environment or local residents. The EIA has been undertaken in line with the following two pieces of legislation, relevant to the planning application and marine works the Town & Country Planning (Environmental Impact Assessment) Regulations (2011) and Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and covers the following aspects; .

- Geology (construction phase);
- Water quality (construction phase);
- Sediment quality;
- Marine ecology;
- Fish and Fisheries (construction phase);
- Ornithology;
- Marine Navigation;
- Terrestrial Ecology;
- Traffic and Transport;
- Noise and Vibration (Operational phase); and
- Air Quality

3.0 Consultations :-

3.1 Hopton-on-Sea Parish Council: No objection

3.2 Corton Parish Council: Any comments to be reported

3.3 Notice/Neighbours: 23 emails/letters of support which are summarised below;

- We are totally in favour of the defences scheme proposed. This is completely in accord with the "Hold the line" policy that the vast majority of the village favours. Though there is obviously an element of vest interest we should be grateful that Potters are prepared to invest in this scheme that will benefit all residents and visitors.
- Bourne Leisure have completed their defences and we hope Potters will be successful in their scheme which will therefore help to secure our properties and other residents against coastal erosion for many years to come.
- I believe it is imperative for work to be carried out in order to help safeguard Potters business , surrounding homes and, in the long term, the future of Hopton Village
- We support this proposal because Potters are a major employer and brings finance into the Borough. It will also enable Potters to develop new projects with confidence.
- I would most certainly support the scheme I have witnessed the benefits of the rocks it makes sense to continue the protection as far as possible

- I believe it would be good for the village and for the coastline and would love it if it could go ahead
- I fully support this application to protect the coastline for the public interest and the private land at the top of the cliffs

3.4 Waveney District Council Coastal Management –

Comments by WDC on the GYBC Planning Application 06/15/0549/F regarding: Private coast protection works at Hopton by Potters Leisure Ltd.

The proposed development falls outside of, but is immediately adjacent to, the northern boundary of Waveney DC's zone of coastal management authority at Corton. It therefore has potential to affect WDC's coastal management interests. This response assumes that Great Yarmouth BC, as the relevant Coastal Management Authority, will provide primary feedback on the development and that GYBC will consult with others, including WDC, on the development under section 16 of the Coast Protection Act.

This response deals only with the implications for WDC coastal frontages. It is primarily based upon current adopted Shoreline Management Plan (SMP) policy but additionally considers the potential change in policy arising from an ongoing Coastal Strategy Study (CSS) for the Gorleston to Lowestoft frontage. Furthermore the response is based on information supplied with the application which did not include the Environmental Statement Appendices (that by reference included a report on Coastal Process Modelling which is key to WDC's interest in the development).

Current SMP policy for the WDC frontage is described in SMP

It may be summarised as follows: The long term plan is to allow cliff retreat to create a naturally functioning eroding coast that releases sediment to feed other higher priority frontages. Defences will not be maintained and not replaced when they fail. Management of an ex-MoD bunker located on the frontage requires further detailed assessment.

Current SMP policy for the Hopton frontage in SMP

It is summarised as follows: Defences will be sustained by repair and maintenance up to ~2025, under a policy of Hold the Line, but would not be enhanced or replaced. The policy would then revert to Managed Realignment subject to identification of social mitigation measures that would aid community adaptation.

Assessment under current SMP policy.

The planned works over the GYBC frontage go beyond the scope of potential works identified in the SMP but are reasonable as a means of achieving the SMP outcome for Hopton, (to extend the defence life to beyond 2025) assuming that the investment plan allows for their removal when policy changes to Managed Realignment. Their impact on the WDC frontage is therefore potentially more significant in that there is greater potential for interruption of sediment movement which may increase the rate of erosion over the WDC frontage. In the context of the WDC policy for no intervention other than defence ruin management, and with regard to natural

variability in erosion rates, the additional risk of the planned works to WDC interests is low. The most significant issue is that the work may bring forward the exposure by erosion of a MoD bunker which could have major environmental impacts.

Another notable issue is the identified potential for the planned works to be extended further south, to prevent outflanking, if future monitoring reveals significant erosion. To be compliant with the current SMP the proposal should be designed with a south end termination included that can manage future outflanking, which is highly probable. The proposal is lacking in this respect. This gap is probably linked to other works underway by Potters to extend the life of the remaining intact part of the WDC seawall immediately south of the planned development.

Assessment under the CSS.

The CSS has developed an 'aspirational direction' that may lead to a change in policy over the Hopton and North Corton frontages. The CSS preliminary preferred approach allows / encourages new works to resist erosion over the Hopton and north Corton frontage. The southern extent of allowable / desirable new works is not yet fixed but is likely to extend into the WDC frontage by up to 300 metres.

If confirmed this would allow protection of the MoD bunker frontage and thereby avoid the consequences of it being exposed by erosion. Implementation of this policy by the construction and maintenance of new defences will require private funding and be subject to several consents and so is not certain to proceed. In the context of emerging CSS output the proposed works are compliant. The absence of a termination at the WDC boundary is less significant as the CSS output is likely to allow / encourage and extension of defences into the WDC frontage.

Management of the risk of early exposure of the MoD bunker is a key issue linked to this and any subsequent southern extension of the defence.

To summarise:

- 1 The proposed works are probably compliant with current SMP policy.
- 2 The impact on WDC frontages is to potentially increase erosion rates over the northern part of the Corton frontage which may accelerate exposure of a significant environmental hazard.
- 3 The proposed works are compliant with a potential policy change arising from the CSS that would allow new defences to be built over the north Corton frontage that may mitigate the significant environmental hazard.
- 4 The proposal includes an impact monitoring plan which is key. The preparation and implementation of an agreed monitoring plan together with a requirement for mitigation of any significant negative impacts on the WDC frontage, should be made a condition of approval.
- 5 Subject to acceptance of action described in item 4 above, the risk to WDC is acceptable. Furthermore WDC recognises the strategic net benefit of the proposed works based upon new thinking on management

Further comments by WDC on the GYBC Planning Application 06/15/0549/F regarding:
Private coast protection works at Hopton by Potters Leisure Ltd.
Revision 2 18/1/2016.

Rev 2

I refer to the undated Dr P Barbour note received via GYBC email on 14/1/2016. My further observations after reading it are as follows:

I am satisfied that the replies provided by Dr Barber give a reasonable response to the questions posed in my recent correspondence. I wish to record that in my view there is a high probability that the proposed works will be threatened by outflanking at the southern end within 5 years as the abandoned WDC defence that adjoins it deteriorates. The developer will be required by WDC to submit proposals, for prior approval by WDC, of any future works to protect the proposed defence against this risk.

3.5 Great Yarmouth Port Company Ltd – Commissioned HR Wallingford to assess the application. 2 representations have received both are attached to the report. The second representation followed receipt of additional information from the applicants.

Thank you for your email of 24 November regarding our recent site visit and assessment of the proposed new coastal defenses to protect Potters Leisure Resort at Hopton.

Our responses follow herein. We hope that the following will be of interest and assistance to officers of Great Yarmouth Borough Council when assessing this planning application, in particular, in respect of the following: on why the scheme has become necessary, how it will affect coastal processes and how the plans of Potters Leisure Resort to monitor the coastline may affect the existing multi-party monitoring agreement. Neither the ES nor the ABPmer modelling report set out a clear explanation for the lowering of the beach levels along this frontage.

In the main ES, the authors (Paul Robinson Partners, 2015) have used reports commissioned by Bourne Leisure and have repeated some of the statements made in those regarding the possible causes of erosion and losses of the beaches along the Hopton frontage in recent years; however, they do not appear to have independently evaluated those statements. There is no mention in the main ES document, for example, of the independent review by CEFAS (CEFAS, 2014). In the first part of the ABP report, the authors provide their appreciation of the physical processes operating at Hopton and the wider region. In this section, the complexities of the wider hydrodynamic regime are acknowledged, including the influence of the 'discontinuous offshore sand banks'.

They refer to the hypothesis of SMP (2013) regarding the supposed impact of the Outer Harbour (OH) on sand passing it from north to south but provide no new evidence to support the assertion that the OH could have affected a sediment supply to the beaches at Hopton as a result of the deflection of the tidal streams. As we repeat below, this is not a hypothesis which HR Wallingford considers to be sound. We note that in quoting both HR Wallingford and SMP together in their discussion of past beach lowering at Hopton, ABP's subsequent reference to SMP's claim that the Outer Harbour was a cause for this erosion has the effect of also implying that HR Wallingford concur with this hypothesis.

This is not the case. As we have stated previously, HR Wallingford refutes the alleged link between the Outer Harbour and beach lowering at Hopton. Indeed, ABPmer explicitly states that the Outer Harbour has not affected tidal flows near

Hopton and it is clear that it cannot have affected wave conditions there either. There is scant acknowledgement in their report or the ES of the importance of the constantly shifting nearshore sand banks and they did not carry out sensitivity tests to ascertain how the naturally changing sand bank configuration could affect their modelling results or conclusions.

Turning now to the future, the proposed new defenses along the Potters Leisure Resort frontage are essentially an extension of those built by Bourne Leisure. We agree that these will only have a localised influence on coastal processes; they will certainly not affect the coastline north of the entrance to the Yare in the foreseeable future.

If in the future the net drift is southward, we are of the view that the proposed new defenses in front of Potters Leisure Resort will relocate the existing beach lowering problems further south rather than solve them. We note the commitment made in the ES (page 57) to monitor and remedy such problems as they arise to the south and the north of the proposed defenses by using armour rock from their stockpile; it is unclear, however, how far this commitment extends both along the coastline and in time. This proposed mitigation may be something Great Yarmouth Borough Council could discuss with the applicants.

If the drift is northward, the proposed new defences may affect part of the Bourne Leisure frontage but no further afield than this. Finally, as with the Bourne Leisure scheme, the Potters Leisure Resort scheme will affect beach levels in the area which is currently covered in the Monitoring Agreement which is subject to agreement from various stakeholders (including Great Yarmouth Port Company). We note the further commitment made in the ES for coastal monitoring by Potters Leisure Resort, which refers to a 'monitoring protocol to be agreed with relevant parties in advance of any construction, which will complement the existing agreed monitoring for the recently completed Bourne Leisure scheme'. We would suggest that such extra data collection covers the frontage north, south and in front of the defenses at more closely spaced intervals than at present and is carried out in co-operation with the existing Monitoring Agreement.

It is also important that any new monitoring plan associated with the Potters scheme makes clear how impacts associated with this scheme will be identified, how any mitigating measures will be assessed, and detail on any actions to be undertaken. I trust that this letter may be of interest and of some use to those in Great Yarmouth Borough Council involved in managing coastal processes and defenses.

3.13 Ramblers Association – No comment received

3.14 Natural England: No objection does not consider that that this application poses any likely or significant risk to those features of the natural environment for which would otherwise provide a more detailed consultation response and does not wish to make specific comment on the details of the consultation.

3.15 Hopton Coastal Action Group – fully supports Potters Leisure Resort in their plans for a sea defence in front of their property, this will finally give total security to businesses and properties for the whole of Hopton from the sea.

3.16 Footpaths Officer- The public right of way is aligned along the beach and in parts along the existing concrete defence and so the applicant will need to apply to Norfolk County Council for appropriate temporary enclosure orders of public footpath Hopton No.2a for period that the works are active. Please Note that it takes approx.. 6-8 weeks to process an application.

3.17 Norfolk County Highways: “whilst I have no objection to the proposals, and whilst noting the applications proposal in terms of highway access, never the less I would recommend that the following conditions be appended to any grant of permission if your authority is minded to grant approval.” (These relate to 3 conditions requiring the submission of a Construction Management and Access Plan compliance with the plan and ensuring that the existing drainage outfalls, their grills and tidal flaps are kept free of obstruction at all times.

3.18 Environment Agency: Flood Defences – We have no objections to the proposals and they will not impact on any of our assets. We would recommend that the GYBC Coast Protection Team agrees coastal monitoring programme with the applicant as a condition of consent.

3.19 Environmental Health: No objection subject to conditions (see attached Appendix 7)

3.20 Norfolk Historic Environment Service: No objection subject to imposition of archaeological condition- *Response to new application below_*

“Thank you for consulting the Historic Environment Service on the proposed coastal protection scheme at Hopton Beach (planning reference 06/15/0549/F).

As described in the Environmental Statement submitted with the application, the proposed groynes and rock armour would be installed in an area with known heritage assets and the potential for previously undiscovered heritage assets (Chapter 8). The most important heritage assets believed to exist within the proposed development area are marine and freshwater sediments deposited during the Cromerian interglacial (Cromer Forest-Bed Formation). Discoveries of artefacts within these sediments at Happisburgh (to the north) and Pakefield (to the south) are evidence for pre-glacial human activity, include the earliest known evidence of human occupation in northwestern Europe and are of international significance.

The authors of the Environmental Statement highlight the potential for Cromerian sediments to survive within the development area (pages 111-112). This potential is supported by the interpretations of geological records that suggest during the 19th century Cromerian sediments could have survived beneath glacial till and sands below the level of the beach (the level as it was when the records were compiled; information provided to the Historic Environment Service by the Norfolk Geodiversity Partnership). Unfortunately, as no geotechnical investigations are presented in the

Environment Statement, the current survival of sediments below beach level is uncertain.

The Environment Statement states that if Cromerian deposits survive and were found to contain artefacts these would be 'important nationally, if not internationally' (page 118). The Historic Environment Service believes such discoveries would be of international importance.

If Cromerian sediments and artefacts of international importance are present on Hopton Beach, the groundworks included in the proposed development would harm the significance of these. In order to fully understand the level of this harm, it would be necessary to establish whether or not Cromerian sediments and artefacts are present on Holme Beach and, if so, where they are located.

Given the potential for deposits and artefacts of international importance to survive within the development area and the uncertainty about how they would be harmed by the development, the Historic Environment Service recommends the applicant is required to submit further information before the determination of the application (in accordance with paragraph 128 of the National Planning Policy Framework). In this instance, this should include a field evaluation (by borehole survey) carried out by an archaeological contractor with proven experience of working on Palaeolithic sites. The results of the borehole survey would be used to fully understand the impact of the proposed development and enable the making of a fully informed planning decision.

Although the Environment Statement states the Historic Environment Service was consulted about the scope of the Environmental Statement (page 108), we have no records of this consultation having taken place. We were consulted on another scheme proposed for land to the north of the development area (06/13/0685/F) and we have reason to believe the advice we gave on this project has been used to inform the applicant's Environmental Statement. Since this advice was provided in November 2013/February 2014 new information has become available and new archaeological approaches to coastal protection schemes have been applied elsewhere on the Norfolk coast. This information and these approaches have been used to inform our recommendations for this proposed development.

The Marine Management Organisation (MMO) has indicated that a marine licence will be required before this proposed development can proceed (email to the Borough Council dated 15 October 2015). When an application is submitted for a marine licence, we would expect the MMO to consult Historic England and possibly the Historic Environment Service."

3.21 Marine Management Organisation – Please can you inform the applicant that they may require a licence under the Marine and Coastal Act (2009)

4. Policy :-

4.1 National Planning Policy

4.2 The National Planning Policy Framework(NPPF) sets out the Governments planning policies. The principles of sustainable development underpin the NPPF and its associated technical guidance with the three pillars of sustainable development (environment, social and economic) viewed as the golden thread running through.

4.3 The document in 'Meeting the challenge of climate change, flooding and coastal change' in (Paragraphs 93 to 108).

4.4 (Paragraph 93) states that planning plays a key role in minimising vulnerability and providing resilience to the impacts of climate change (Para 94) and (reiterated Para 99) states that local planning authorities adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply demands and considerations.

4.5 (Para 105) states that in coastal areas, local planning authorities should take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes.

4.6 (Para 106) states that local planning authorities should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and at (Para 107) when assessing applications, authorities should consider development in a Coastal Change Management Area appropriate where it is demonstrated that:

- it will be safe over its planned lifetime and will not have an unacceptable impact on coastal change;
- the character of the coast including designations is not compromised;
- the development provides wider sustainability benefits; and
- the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast.

5.0 Marine Planning and East Inshore and East Offshore Marine Plans 2014

5.1 The Marine and Coastal Access (2009) established a legislative basis for a system of marine planning in England. The aim of the system is to achieve sustainable development in the marine area. The UK Marine Policy Statement 2011 provides the overarching policy framework and a number of geographically based plans will translate the Marine Policy Statement into detailed policy and guidance for particular areas. Parts of the Statement relevant and with specific ref to here states that coastal erosion risk management if not managed properly, may result in direct effects on the coastline, seabed marine ecology, heritage assets and biodiversity.

5.2 It states that indirect changes to the coastline and seabed might also arise as a result in response to some of these direct changes. This could lead to localised or more widespread coastal erosion or accretion and changes to offshore features such as submerged banks and ridges. Interruption or changes to the supply of sediment due to infrastructure has the potential to affect physical habitats along the coast or in estuaries.

Role and scope

5.3 . Plan policies are central to the role of marine plans in giving effect to, and conformity with, national policy. For example the Marine Policy Statement states that 'Marine plans will set out how the Marine Policy Statement will be implemented in specific areas...' (Marine Policy Statement 1.1.3), and also 'Marine plans will provide a clear, spatial and locally-relevant expression of policy, implementation and delivery' (Marine Policy Statement 2.2.1).

5.4. Other national policy that the plan policies need to take account of includes that set out in the National Planning Policy Framework (see chapter 1 'National policy context'). As such, the plan policies do not establish new requirements but rather apply or clarify the intent of national policy to the East plan areas taking into account the specific characteristics of those areas, including the available evidence. The plan policies therefore add value by directing activities to the most suitable locations, building on best practice and integrating the marine and terrestrial planning systems.

5.5 The plan policies directly contribute to delivery of the vision and objectives for the East Inshore and East Offshore Marine Plans, particularly by informing how decisions should be made. The Marine Policy Statement states that plan policies will provide detailed policy and spatial guidance for an area, and help ensure that decisions within a marine plan area contribute to delivery of United

5.6 The East Inshore and East Offshore Marine Plans seek to support and complement existing plans wherever appropriate. Signposting is used in these marine plans to point towards relevant information and policies held in other existing plans. This avoids replication of policies and ensures new plan policies and supporting information focus on issues where they can add value.

5.7 Examples of other plans of relevance include Local Plans and their equivalents such as Local Development Frameworks/Core Strategies, River Basin Management Plans, Shoreline Management Plans, Estuary Management Plans, European Marine Site management schemes, Area of Outstanding Natural Beauty management plans, and the Broads Authority plan. To enable integrated coastal planning, specific attention has been given to assessing the policies in local development frameworks and other plans thereby informing the production of these marine plans.²⁴

5.8 Marine policy states that Marine plan authorities should be satisfied that activities and developments will themselves be resilient to risks of coastal change and flooding and will not have an unacceptable impact on coastal change. A precautionary and risk-based approach, in accordance with the sustainable development policies of the UK Administrations, should be taken in terms of understanding emerging evidence on coastal processes.

5.9 Marine plan authorities should consider existing terrestrial planning and management policies for coastal development under which inappropriate development should be avoided in areas of highest vulnerability to coastal change and flooding. Development will need to be safe over its planned lifetime and not cause or exacerbate flood and coastal erosion risk elsewhere.

5.10 Marine plan authorities should not consider development which may affect areas at high risk and probability of coastal change unless the impacts upon it can be managed. Marine plan authorities should seek to minimise and mitigate any

geomorphological changes that an activity or development will have on coastal processes, including sediment movement.

5.11 The East Inshore and Offshore Marine Plan (MMO 2014) was adopted and published in April 2014 by the Marine Management Organisation. The East Inshore Marine Plan Area includes the coastline stretching from Flamborough Head to Felixstowe, extending from mean high water out to 12 nautical miles, including inland areas such as the Broads and other waters subject to tidal influence, and covers an area of 6,000 square kilometres. The aim of marine plans is to help ensure the sustainable development of the marine area. Marine plans will contribute to economic growth in a way that benefits society whilst respecting the needs of local communities and protecting the marine ecosystem.

5.12 The discusses coastal change management that during the preparation of an application for development, there is significant value in looking at these SMPs to ensure the activity does not increase the risk of coastal erosion or flooding stating at that 'compatibility and integration with these plans is paramount to managing the risk of coastal erosion and flood risk'. This approach is consistent with the Marine Policy statement and the approach advocated in the NNPF.

5.13 The East Inshore area includes part of the scheme at Hopton and comes under new Marine planning regime. A licence for and approval of the works will be required from the MMO and the application has been published stating as much in local papers in Suffolk and Norfolk.

5.14 The Marine plans come into effect once they are adopted by the Secretary of State and published. The MCAA requires that all public authorities taking authorisation or enforcement decisions, must do so in accordance with marine policy documents (marine plans and the Marine Policy Statement) unless relevant considerations indicate otherwise. Where a relevant decision is not taken in accordance with the marine plans, the public authority must state its reasons.

5.15 The Marine Plan incorporates a number of policies that accord with the National Planning Framework objectives to promote sustainable development, economic growth and social welling particularly Policy EC1, EC2, EC3 and SOC1 and this proposal is considered compatible with those Policy objectives.

6.0 Great Yarmouth Local Plan 2001 saved policy INF16 states:

When considering applications for new development in coastal areas where there are no significant environmental or landscape conservation considerations, but which may be in an area susceptible to marine erosion and associated land instability as shown on the proposals map, the Council will require the application to demonstrate conclusively that:

- a) there would be no significant risk that the proposal would be adversely affected by marine erosion or land instability within its lifetime; or,
- b) the proposed development would be capable of withstanding the effects of any anticipated erosion/instability or would be protected from it.

Core Strategy

Policy CS13 – Protecting areas at risk of flooding or coastal erosion states the risk of flooding and coastal change is expected to increase with climate change. This presents a challenge for property business owners and service providers in susceptible areas. It goes on to state that the Council will ensure a practical and sustainable approach to flood risk and coastal protection.

7.0. Further Information and Clarification

7.1 In response to the comments raised by Waveney District Council the following comments were received by the applicants consultant Dr. P Barber 24/11/15 and 14/12/15

7.2 The effects of the proposed scheme on the MoD bunker are considered to be negligible with the shortened terminal groyne and the distance south from this groyne to the bunker location. The quoted maximum extent of southerly scheme influence of 200m assumes a net southerly drift and no shortening of the terminal groyne.

7.3 Recent work carried out for Bourne Leisure and made available to CH2MHILL carrying out the CSS shows how the beach sand exchanges on-offshore extend out to around 100m from the shoreline in water depths of around 5m below OD.

7.4 The on-offshore extents of the new groynes at around 50m recognises this exchange distance allowing sand exchanged from and to the beach to pass across the groyne extremities. As this sand bypasses the scheme alongshore limits it takes around 100/150m to return to the shoreline and it is from around 50m to 150m beyond the scheme limit where any scheme impact on beach levels is likely.

7.5 This is where the mitigation would be targeted with a stockpile of rock included as part of the scheme to allow prompt mitigation if needed. If the mitigation was fully utilised then it would serve as outflanking protection and be available for future modification as actual shoreline evolution required.

7.6 The model study report is over 12 months old but the results have been reviewed against present conditions and are considered to remain relevant. Regarding in-combination effects with the BL scheme then the boundary between the schemes is seamless. The volume of sand moving across the groyne seaward extremities in both alongshore directions is plentiful and there are no significant effects anticipated on the BL beaches.

7.7 Observation of the BL scheme impacts to the north since scheme completion in early 2015 are that the effects conform to forecast providing confidence in the design approach here which is similar to that adopted for the Potter's scheme.

7.9 Great Yarmouth Port Authority- HR Wallingford (HRW) conclude that there is no effect north of the River Yare but volunteer considerations for the LPA in dealing with this application.

7.10 Any observations of beach behaviour along the Potters frontage in February

2015 would be influenced by the temporary stockpiles of rock there for use in the Bourne Leisure scheme rendering them to be potentially transient and thereby of no relevance to future beach behaviour.

7.11 Tidal currents will be altered along the Potter's frontage with the proposed scheme in place but since the groynes extend similar distances on-offshore to the BL scheme the effect on tidal currents across the BL scheme will be minor and localised to the boundary between the two schemes.

7.12 HRW exhibit a lack of appreciation of the significance of cliff erosion to the beach regime. This significance has been recognised as minor in the recent CSS work undertaken by CH2MHILL and by the work carried out by BL for their recent scheme to the north.

7.13 The recent CEFAS report is concerned with the effects of the harbour where HRW consider effects of the proposed scheme to be negligible.

7.14 Regarding comments on the changes to the offshore banks it is true that HRW examined three different bathymetries for the banks in their work in 1998 for the outer harbour but only to reach the conclusion that such bank changes could be significant as shown by their limited model.

7.15 More recent work carried out by Bourne Leisure and made available to the CSS shows that the use of historic bank configurations over the last 40 years is not relevant as the banks have undergone trend changes over this period rather than cyclical and that since 2005/8 the banks have exhibited a stability in form and location supporting the assumption adopted in the current SMP of taking the banks and channels as configured in 2005 as the context for future policy.

7.16 Finally HRW raise the issues of mitigation and monitoring. This is to be similar to the measures accepted for the Bourne Leisure scheme with the monitoring integrated to provide an overall coherence.

8.0 Appraisal

8.1 The proposal can be divided into two parts for coastal engineering purposes; the first is the linear rock protection to the toe of the sea wall set above mean high water. This is intended to provide protection to the toe of the cliffs and control the existing erosion caused by the wave action during adverse storm or surge conditions. As this part of the defence would normally be out of the sea it should not impede the coastal processes. With the use of rock, there will be a reduction in the effect of reflected wave as compared to that of the existing defence structures which will help to encourage the retention of the beach.

8.2 The second part of the proposal is to construct ten number rock fishtail groynes 50m long and at 110m spacing along the length of the area covered by the rock revetment. The existing groynes along this section are considered to be in a poor condition and it is proposed that they are removed following the installation of the

rock groynes. Similarly the existing timber revetment will be removed as the work progresses.

8.3 It is intended to have in place a monitoring agreement and an agreed action plan with trigger levels to enable all concern to understand any changes, should they occur, to the coastal processes and respond appropriately. From the reports the areas that may be affected are those immediately to the north and south of the proposed scheme location. It is intended to include the neighbouring authority (Waveney District Council) in the monitoring agreement and any other relevant authority or agency with a direct interest in this area.

8.4 The Shoreline Management Plan (SMP) policy for this area states “hold the line” up to year 2025 and then “managed realignment”. Following consultation with the SMP delivery group it is proposed to review this policy within the current Gorleston to Lowestoft Strategy Review which is currently underway and to take account of the more recent information. It is not considered that the proposed works will present an obstacle to the objective of the SMP, which is to provide a sustainable coastline for this area.

8.5 Norfolk Geodiversity Partnership and the Historic Environmental Services – Norfolk County Council have concerns about excavation and damage to features of geological conservation importance. On the Bourne Leisure scheme it was accepted by NCC that there are no excavation requirements for the permanent works. The rock is to be placed on the beach sand however a condition can be imposed to address the matter if still considered necessary in the light of the consultation response.

8.7 A Marine Management Organisation (MMO) licence is required, the applicant has stated that discussions have been held with the MMO and an application is in the process of being made.

8.8 In conclusion It is recognised that these works will help the sustainability of the Potters Leisure site, provide stability to the remaining defence structures and help alleviate the concerns of the local community.

9.0 Assessment

9.1 In the main there is little overall objection in the statutory consultees responses to this application. Local support is weighed heavily in favour of the proposal which continues the emergency works already undertaken to reinforce the coastline and is anticipated to give some 20 years protection to the coast.

9.2 Operational details in as far as they amount to onshore activities associated with the works are in the main considered to be minimal and subject to controlling conditions on of hours of working etc the concerns of Environmental Health can be addressed. The recently completed works at Bourne Leisure demonstrate that the works can be carried out with the minimum of disturbance to the amenity of area and indeed the operations of Potters Leisure.

9.3 In terms of highway movements apart from those identified above these are anticipated to be minimal with the heavy duty rock being transported to the site by

water and not road. The requirement for a Construction Management Plan and compliance with the plan should again be imposed if approved. A further condition should also address the concerns regarding ensuring the Highway surface water should also be imposed.

9.4 On the technical side there are comprehensive responses to the proposals from the Great Yarmouth Port Authority Ltd consultation which states that they agree that the defences will only have a localised influence on coastal processes and will not affect the coastline north of the entrance to the River Yare in the foreseeable future. They do highlight a similar issue to take raised by Waveney regarding the possible impact of a change in the net drift from north to south and the potential impact of this - a point of detail the applicant has responded to – including comments on the monitoring agreement and stakeholders party to the agreement. The monitoring agreement used for the Bourne Leisure will form the template for this proposal.

9.5 Waveney District Councils Coastal engineers have set out the context of the Shoreline Management Plan and how it relates to this scheme. It is clear in procedural terms that the scheme - which does not involve the public purse- has support including an acknowledgement that the baseline data has changed to that on which the SMP policy was formulated. The policy is in the process of being modified to incorporate private investment and the potential impact of such schemes on the coastline.

9.6 Concern has also been raised reference the potential of the proposal on land at the southern (Corton) end of the scheme. This will need to be monitored as part of the overall monitoring agreement to assess the impact of the process to ensure no adverse impact occurs as a direct result of this scheme if Members are minded to approve the proposal. Again a similar monitoring agreement to that formulated for the Bourne Leisure will be used and condition on planning notice.

9.7 In this respect and to give an overall of the scheme the views of the GYBC Coastal Manager are set out below and set out the officer view and recommendations for these proposals.

9.8 Private coast protection works at Hopton by Potters Leisure Ltd.

9.9 This application is for a proposed coastal defence works intended to protect the coastline fronting Potters Leisure Ltd site at Hopton. The works will consist of a rock revetment running along the toe of the existing concrete sea wall and four rock groynes.

9.10 Having read through the supporting documentation together with the technical comments from other reviews I believe that this scheme will offer protection to the existing defences and a degree of stability to the area.

9.11 The documentation explains the areas where there may be adverse effects and the mitigation measures that will be taken should these occur. The proposed works are effectively a continuation of the scheme recently completed in front of the Bourne Leisure site and the intention is to implement similar monitoring and mitigation measures. With these monitoring and mitigation measures in place I would recommend approval of this application.

9.12 In conclusion It is recognised that these works will help the sustainability of the Potters Leisure site, provide stability to the remaining defence structures, contribute to alleviate the concerns of the local community and continue to promote the social and economic activity in the area whilst protecting the substantial and future financial investment in Potters Leisure.

10.0 RECOMMENDATION :-

10.1 APPROVE- the proposal complies with Policy INF16, CS16 and the aims of the NNPF and Marine Policy subject to the conditions outlined above including a monitoring agreement including trigger levels and subject to referral to the Secretary of State in accordance Environment Assessment Regulation 2011 as necessary

Background Papers and full list of residents comments available on planning file 06/15/0549/F and Council website.

GREAT YARMOUTH PORT COMPANY LIMITED

Eastport House UK
South Beach Parade
Great Yarmouth
Norfolk NR30 3GY

By Email Only

Great Yarmouth Borough Council

Local Planning Authority

Fao Mr D Minns

30 October 2015

Dear Sirs,

Planning Application Ref 06/15/0549/F

Coastal Defences – Potters Leisure Resort

Letter of Representation

Please see the attached letter of even date from HR Wallingford to us which contains our representations on the aforementioned planning application in advance of the due deadline for the same.

Please can HR Wallingford's letter and observations be drawn to the attention of, and taken into consideration by the Planning Committee in its deliberations in respect of this application. We anticipate that the Council's coastal processes engineers and scientific advisers will consider the scientific issues raised and will advise the Committee accordingly of the concerns raised, and implications arising therefrom.

Yours faithfully,



pp Eliza O'Toole
Deputy Chair

Attachment: HR Wallingford letter dated 30 October 2015 to Great Yarmouth Port Company

[3 pages in total]

Eliza O'Toole
Deputy Chair
Great Yarmouth Port Company Ltd
EastPort UK House
South Beach Parade
Great Yarmouth
Norfolk
NR30 3GY

30 October 2015

Dear Eliza

**Great Yarmouth Borough Council Planning Application 06/15/0549/F
Coastal Defence application at Potters Leisure Resort, Hopton.**

Following your request to us we have reviewed the planning application information on the GYBC website, and we have sent two of our specialists to site to review the conditions at the site.

From our assessment we draw the following conclusions:

- The scheme itself will aim to increase beach levels along this frontage which would therefore not only benefit the amenity value of the coastline, but also protect and/or increase the value of the adjoining land by way of reducing the risk of cliff top recession;
- Our observations indicated there had been a substantial southward drift of beach sand prior to our most recent site visit this week, contrasting with the situation on the day of our visit earlier in the year in February 2015, when the drift was apparently northward. The beach loss along the frontage to the south of the new rock groynes is consistent with what could be expected given a net southerly drift and following the construction of the new groyne scheme at the Bourne Leisure site.
- As with the region immediately to the north (at the Bourne Leisure frontage) we consider that the low beach levels at this location are not caused by the Outer Harbour;
- The planning application information provided on the website is missing appendices to the Environmental Statement (ES) so that a full review of the supporting studies for the Potters Scheme has not been possible. We do note however that the authors to the ES refer to the work carried out on behalf of Bourne Leisure, and some of the statements made in these reports in respect of possible causes of erosion are repeated in the ES.
- We stress therefore that whilst the scheme will help to promote an improved amenity, and reduce the risk of cliff erosion and land loss at Potters we reconfirm our considered opinion that the low beach levels at Potters are not caused by the Outer Harbour at Great Yarmouth.

continued.....



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HR Wallingford

- We agree with the finding in the ES that the scheme will not affect the tidal currents as far north as the entrance to the Haven or the Outer Harbour. We disagree with the statement, however, that the scheme will not have changed the tidal currents *along the Hopton frontage*.
- One of the objectives of the proposed new defences for the Potters Resort is to increase beach levels and that implies a reversal of the recent trend of loss of sand from those beaches. There will certainly be changes in the movements of sediment (principally sand) caused by the defences and their construction locally. The obvious concern is where and to what extent such changes may affect coastal morphology, particularly beaches, along the adjacent coastline.

There is no doubt that sand moves along the beaches at and near Hopton in different directions at different times, in response to changing tidal and more importantly wave conditions.

- If in the future the net drift is southward, the proposed new defences in front of Potters Resort will relocate the terminal groyne scour problem further south rather than solve it entirely. We note the commitment made in the ES to monitor and remedy such problems as they arise. But in this situation, there will be no effect of those new defences on longshore sediment transport as far north, i.e. 'upstream', as the entrance to the Haven or the Outer Harbour at Great Yarmouth.
- If in the future the net drift is northward, the new defences may have some effect on beach morphology further north by altering the both the longshore drift and reducing the possible supply of sediment from cliff erosion. However, such effects are only likely to be felt within the bays between the new groynes fronting Hopton Holiday Village. These large structures will very effectively filter the effects of any changes along or south of the Potters Resort frontage, so ensuring they will not affect the coast as far north as the entrance to the Haven or the Outer Harbour at Great Yarmouth.
- Clearly, the scheme at Potters will affect the beach levels there, and in the vicinity. This is an important point also to be made to GYBC, since the area in question falls within the monitoring area currently under survey as part of the ongoing Monitoring Agreement with GYPC to which GYBC, amongst others, is a party.

Yours sincerely

Tim Chesher
Group Manager, Coasts and Estuaries Group

GREAT YARMOUTH PORT COMPANY LIMITED

Eastport House UK
South Beach Parade
Great Yarmouth
Norfolk NR30 3GY

8 December 2015

By Email and Hand Delivery

Fao Dean Minns

Dear Sirs,

Planning Application Ref 06/15/0549/F

Please find a letter from HRW to Great Yarmouth Port Company ("the Port") dated 30 November in respect of Planning Application Ref 06/15/0549/F following your email to us of 16 November.

Please treat HRW's letter as comprising further representations of the Port in respect of the aforementioned planning application and the appendices supplied to us on 16 November. Please confirm our representations will be considered fully and taken into account in respect of the application process.

Yours sincerely



Eliza O'Toole
Deputy Chair
Great Yarmouth Port Company Ltd

Enc Letter to Great Yarmouth Port Company Ltd from HR Wallingford.

4 pages in total



Eliza O'Toole
Deputy Chair
Great Yarmouth Port Company Ltd
EastPort UK House
South Beach Parade
Great Yarmouth
NR30 3GY

Our Ref: DDM7024

30 November 2015

Dear Eliza

PROPOSED NEW COASTAL DEFENCES, POTTERS LEISURE RESORT, HOPTON

Thank you for your email of 24 November regarding our recent site visit and assessment of the proposed new coastal defences to protect Potters Leisure Resort at Hopton. Our responses follow herein.

We hope that the following will be of interest and assistance to officers of Great Yarmouth Borough Council when assessing this planning application, in particular, in respect of the following: on why the scheme has become necessary, how it will affect coastal processes and how the plans of Potters Leisure Resort to monitor the coastline may affect the existing multi-party monitoring agreement.

There is no doubt that beach levels fronting Potters Leisure Resort have become very low directly in front of the vertical sheet-steel piled wall fronting the promenade. If the front edge of that seawall is undermined, and this is the normal way in which a seawall ultimately fails, landslips and recession of the edge of cliffs will soon follow. The Environmental Statement (ES) prepared for Potters Leisure Resort (Paul Robinson Partnership, 2015) mentions 'failure of the coastal defences at two locations', apparently during the very stormy winter of 2012/13, but does not describe these failures further.

Neither the ES nor the ABPmer modelling report set out a clear explanation for the lowering of the beach levels along this frontage. In the main ES, the authors (Paul Robinson Partners, 2015) have used reports commissioned by Bourne Leisure and have repeated some of the statements made in those regarding the possible causes of erosion and losses of the beaches along the Hopton frontage in recent years; however, they do not appear to have independently evaluated those statements. There is no mention in the main ES document, for example, of the independent review by CEFAS (CEFAS, 2014).

In the first part of the ABP report, the authors provide their appreciation of the physical processes operating at Hopton and the wider region. In this section, the complexities of the wider hydrodynamic regime are acknowledged, including the influence of the 'discontinuous offshore sand banks'. They refer to the hypothesis of SiMP (2013) regarding the supposed impact of the Outer Harbour (OH) on sand passing it from north to south but provide no new evidence to support the assertion that the OH could have affected a sediment supply to the beaches at Hopton as a result of the deflection of the tidal streams. As we repeat below, this is not a hypothesis which HR Wallingford considers to be sound.

continued.....



Address and contact details

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We note that in quoting both HR Wallingford and SMP together in their discussion of past beach lowering at Hopton, ABP's subsequent reference to SMP's claim that the Outer Harbour was a cause for this erosion has the effect of also implying that HR Wallingford concur with this hypothesis. This is not the case. As we have stated previously, HR Wallingford refutes the alleged link between the Outer Harbour and beach lowering at Hopton. Indeed, ABPmer explicitly states that the Outer Harbour has not affected tidal flows near Hopton and it is clear that it cannot have affected wave conditions there either. There is scant acknowledgement in their report or the ES of the importance of the constantly shifting nearshore sand banks and they did not carry out sensitivity tests to ascertain how the naturally changing sand bank configuration could affect their modelling results or conclusions.

Turning now to the future, the proposed new defences along the Potters Leisure Resort frontage are essentially an extension of those built by Bourne Leisure. We agree that these will only have a localised influence on coastal processes; they will certainly not affect the coastline north of the entrance to the Yare in the foreseeable future.

If in the future the net drift is southward, we are of the view that the proposed new defences in front of Potters Leisure Resort will relocate the existing beach lowering problems further south rather than solve them. We note the commitment made in the ES (page 57) to monitor and remedy such problems as they arise to the south and the north of the proposed defences by using armour rock from their stockpile; it is unclear, however, how far this commitment extends both along the coastline and in time. This proposed mitigation may be something Great Yarmouth Borough Council could discuss with the applicants.

If the drift is northward, the proposed new defences may affect part of the Bourne Leisure frontage but no further afield than this.

Finally, as with the Bourne Leisure scheme, the Potters Leisure Resort scheme will affect beach levels in the area which is currently covered in the Monitoring Agreement which is subject to agreement from various stakeholders (including Great Yarmouth Port Company). We note the further commitment made in the ES for coastal monitoring by Potters Leisure Resort, which refers to a 'monitoring protocol to be agreed with relevant parties in advance of any construction, which will complement the existing agreed monitoring for the recently completed Bourne Leisure scheme'. We would suggest that such extra data collection covers the frontage north, south and in front of the defences at more closely spaced intervals than at present and is carried out in co-operation with the existing Monitoring Agreement.

It is also important that any new monitoring plan associated with the Potters scheme makes clear how impacts associated with this scheme will be identified, how any mitigating measures will be assessed, and detail on any actions to be undertaken.

continued.....



I trust that this letter may be of interest and of some use to those in Great Yarmouth Borough Council involved in managing coastal processes and defences. If you would like us to do so, we would be pleased to take part in technical discussions with officers from the Council on the ES and the ABPmer modelling report in connection with this planning application.

Yours sincerely

[Redacted signature]

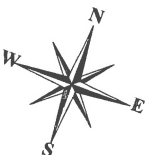
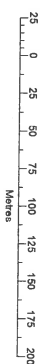
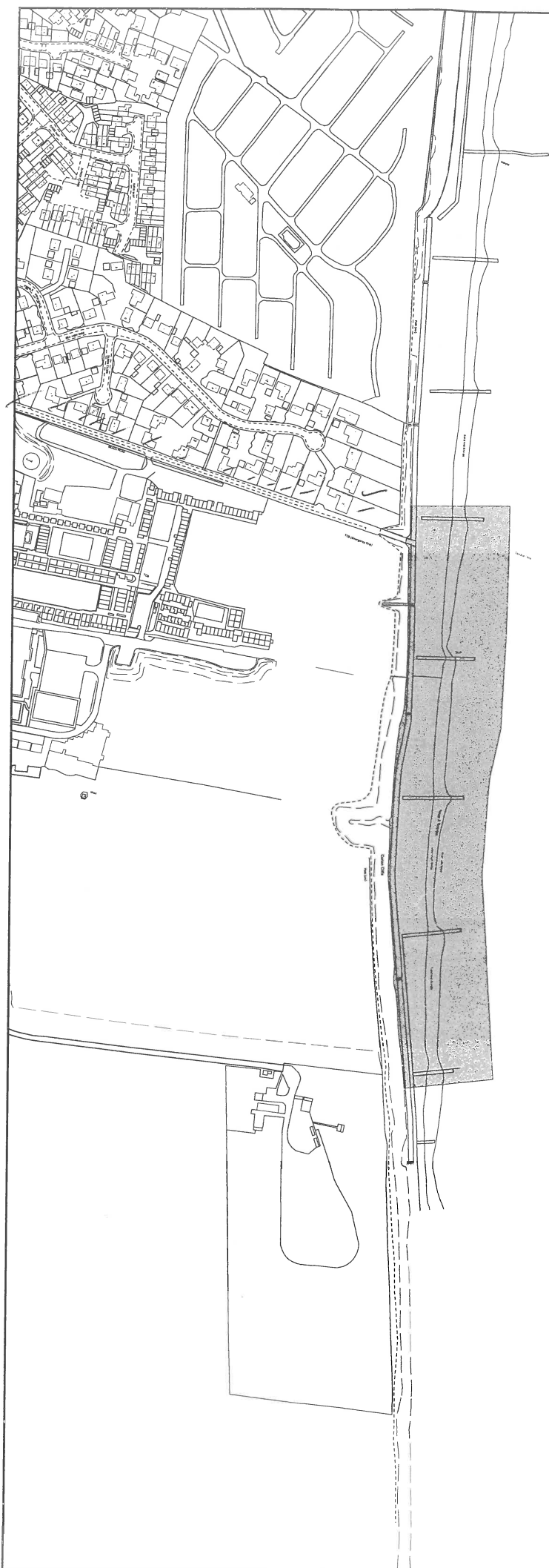
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06/15/0549/F



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