



CABINET

Tuesday 6 October 2020

SLAUGHDEN SHORELINE MANAGEMENT PLAN POLICY REVIEW

EXECUTIVE SUMMARY

1. It is proposed that the Shoreline Management Plan policy at Sudbourne Beach, south of Slaughden be changed to Managed Realignment over all epochs until 2105. This constitutes a 'major' change to the Shoreline Management Plan.
2. The current SMP policy along this frontage is to Hold the Line in the short term but no formal policy was set for the medium and long term. Instead an interim policy of No Active Intervention was defined, "pending an agreed management and investment plan for the Alde and Ore area".
3. Since the SMP, the Alde and Ore Estuary Plan has been endorsed by the Local Authorities. This includes the overall vision that the estuary should remain as it is now and to ensure that defences within the estuary are of a standard necessary to withstand overtopping in a 1 in 200-year event.
4. An extensive public consultation has been undertaken and 97% of those who expressed an opinion supported the change.
5. Whilst this policy change does not guarantee that the shingle barrier at Slaughden will be maintained, it will provide flexibility for the council, working with the Environment Agency to manage changes along this shoreline and respond, if required, to extreme events. As such the policy will promote a more resilient approach to managing this shoreline in the future.

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| Is the report Open or Exempt? | Open |
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| Wards Affected: | Aldeburgh & Leiston |
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| Cabinet Member: | Councillor David Ritchie Cabinet Member with responsibility for Planning and Coastal Management |
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| Supporting Officer: | Sharon Bleese Coastal Manager (South) 07990 793662 Sharon.bleese@eastsoffolk.gov.uk |
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1 INTRODUCTION

- 1.1 The Suffolk Shoreline Management Plan 2 (SMP) from Lowestoft Ness to Felixstowe Landguard Point was adopted in November 2011 by the lead authority Suffolk Coastal District Council (SCDC), Waveney District Council (WDC) (now combined as East Suffolk Council), Environment Agency (EA) and endorsed by the Anglian River and Flood Coast Committee (RFCC).
- 1.2 A Shoreline Management Plan provides a large-scale assessment of the flood and erosion risks associated with coastal processes. It set out policies for the short (first 20 years – in this case up to 2025), medium (20 to 50 years) and long (beyond 50 years) terms for stretches of the coast known as policy units. There are four Shoreline Management Plan policies that have been used for all Shoreline Management Plans in England and Wales: ‘No Active Intervention’, ‘Hold the Line’, ‘Management Realignment’ and ‘Advance the Line’.
- 1.3 This review has concentrated on the stretch of shoreline that extends between the Martello tower at Slaughden, south to Lantern Marshes, known as Sudbourne Beach. This is SMP Policy Unit ORF15.1.
- 1.4 Here, the current SMP policy is to ‘Hold the Line’ in the short term (up to the year 2025), but no formal policy was defined for the medium and long term (beyond the year 2025). Instead the SMP has an ‘interim policy’ of ‘No Active Intervention’ for the medium to long term, which was pending the development of the Alde and Ore Estuary Management Plan.
- 1.5 Environment Agency guidance¹ sets out the procedure for considering a change to an SMP. The change in policy proposed here constitutes a ‘major’ change, as defined by 2013 Environment Agency guidance². This defines several criteria for defining a major change:
- 1) Changes to a policy, or epoch in which a policy is to be implemented, or changes to the action plan that are likely to result in this.
 - 2) Changes to the action plan that are likely to significantly impact on SMP implementation, such as significant new schemes and studies, or significant changes to existing ones.
 - 3) Mapping corrections that affect the number of properties protected from flooding or erosion.
 - 4) Changes impacting an internationally designated site, e.g. SAC, SPA, Ramsar.

Changes here fall under criteria 1.

- 1.6 The 2013 Environment Agency guidance identifies several reasons why a change to SMPs may be necessary:
- 1) significant new **research** or evidence on parameters that informed the decisions taken whilst developing the SMP;
 - 2) significant changes in **Government policy** – such as on spatial planning and adaptation – since the SMP was approved;

¹ Environment Agency (2013) Strategic planning for flood and coastal risk management: Shoreline management plans - monitoring, change and reporting. Operational instruction D12_34.

² Environment Agency (2013) Strategic planning for flood and coastal risk management: Shoreline management plans - monitoring, change and reporting. Operational instruction D12_34.

- 3) significant new evidence arising from further investigation into local options, such as from a **Strategy Plan / scheme feasibility study**;
- 4) a severe **event** has made an element of the existing SMP policy or action plan untenable;
- 5) textual **correction or clarification** of meaning required since SMP approval;
- 6) **organisational change** amongst those involved in SMP development that may affect SMP implementation;
- 7) a need to update or amend programmes of work following **work progressed**.

The recommended change in policy is for reasons (3) **Strategy plan** and (4) **event**.

- 1.7 In making a ‘major’ change to an SMP, a formal approval process needs to be followed. This is to make sure that any changes to the SMP are consistent with the national framework guidelines, reflect the complex and different pressures on the coast and are legal. This process includes: initial agreement from the Suffolk Coast Forum (as agreed June 2019), public consultation (undertaken during October and November 2019) and approval by Cabinet.
- 1.8 Once approved by Cabinet a major change in policy has to be notified to the Anglian (Eastern) Regional Flood and Coastal Committee before final signature from the Environment Agency.

2 SMP POLICY CHANGE PROPOSAL

- 2.1 Slaughden beach comprises a narrow shingle ridge which encloses the River Ore. Recent natural changes along the coastline, due to significant events, mean that that in places the existing shingle barrier has become more vulnerable than it used to be. Without works to help maintain this feature, this barrier is at potential risk from breaching, which could substantially alter not only the River Ore, but also the wider Alde and Ore Estuary.
- 2.2 Since the SMP, the Alde and Ore Estuary Plan has been endorsed by the Local Authorities. This sets out the overall vision that the estuary should remain as it is now and to ensure that defences within the estuary are of a standard necessary to withstand overtopping in a 1 in 200-year event.
- 2.3 These changes since the SMP have therefore prompted the need for a review of current policy.
- 2.4 The review has involved three phases. Phase 1 has looked at alternative policy options and the ways these could be implemented. Phase 2 has involved additional environmental studies considering whether the approaches were compliant under the Conservation of Habitat and Species Regulations 2017 and the Water Environment (Water Framework Directive) Regulations 2017. Phase 3 (discussed below) has involved an appraisal of potential environmental impacts and consultation.
- 2.5 Following review and approval of Phase 1 and 2 reports by the Project Review Group, a recommendation was made to the Suffolk Coastal Forum that subject to further studies a headline policy change for the policy unit to Managed Realignment was appropriate. The government (Defra) definition of Managed Realignment is ‘allowing the shoreline to move backwards or forwards, with management to control or limit movement’.
- 2.6 Although it is not necessary to define a preferred approach to delivering a policy of Managed Realignment as part of a policy review, an additional study (Phase 3 report) was then

undertaken to look at which approaches would be more environmentally acceptable. This assessment has looked at several alternative measures that could be used to implement a policy of Managed Realignment along (A) the defended section up to the Martello Tower and (B) the undefended and eroding section from Martello Tower down to the southern end of Sudbourne Beach. Further south, the beach widens and is building, so no measures are required here.

Along A, the following measures were considered:

- maintain and improve the existing revetment
- widen the defence, by adding a buffer of shingle on the rear face of the ridge
- a new embankment constructed along the estuary channel

Along B, the following measures were considered:

- widen the shingle ridge by adding shingle to the landward side of the ridge
- 'natural' shingle ridge management, minimising intervention but still maintaining and managing the barrier to minimise risk of a permanent breach
- a new embankment constructed along the estuary channel.
- a new embankment constructed between the shoreline and the channel.

These different measures were appraised against the same environmental criteria as in the original SMP to determine possible impacts of the different measures. In undertaking this work, expert advice was provided by Natural England and the Alde and Ore Partnership.

- 2.7 The conclusion from the Phase 3 report was that dependent on the measures adopted and their implementation, a change in SMP policy to Managed Realignment would be environmentally acceptable. It is, however, recommended that further appraisals will be required should a scheme be undertaken to carry out the SMP policy, with specific focus on potential loss or damage to internationally designated habitats within the site.
- 2.8 Community consultation undertaken between October and November 2019 (see below) supports the change in policy, with 97% of respondents in agreement.

3 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?

- 3.1 We set out clearly in our East Suffolk Strategic Plan that 'we will put the environment at the heart of all we do'. Our measures of success includes that 'national and local policies reflect our environmental concerns'. The Coastal Partnership East service plan, contributing to the Strategic Plan commits to supporting communities to adapt and thrive in the face of a changing climate. Shoreline Management Plans are the principle document guiding local decisions around coastal management. The SMP policies were adopted in 2010 using data from 2005/2006. Assumptions made about how the coast might be managed have since changed based upon a changing climate and new evidence. To meet our objectives and measures of success set out under 'Caring for the Environment' it is vital that we review our coastal management policies and ensure that they are providing the right management intent based upon the best data and evidence.
- 3.2 Significant research has been undertaken by the Environment Agency on the benefits to mental health and well being of visiting, working on or living at the coast. Equally, there is research to suggest the adverse impacts on the mental health of those who rely on the coast for their livelihoods or home of uncertainty of future management intent. This policy change provides reassurance to the local community that a resilience approach

can be taken, in line with the resilience approach adopted by the Alde and Ore Estuary Management Plan, as opposed to the previous policy of No Active Intervention.

4 FINANCIAL AND GOVERNANCE IMPLICATIONS

- 4.1 The change in SMP policy in itself does not commit the District Council to additional financial expenditure as the District Council has permissive powers regarding coast protection.
- 4.2 The change in policy was initiated by East Suffolk Council, as the local authority with erosion risk management responsibility over this frontage, and was agreed by the Environment Agency and Natural England officers.
- 4.3 This policy review has involved working closely with the Environment Agency, Natural England, the Alde and Ore Estuary Partnership, Suffolk County Council, National Trust and the Water Management Alliance (WMA), representing East Suffolk Internal Drainage Board.
- 4.4 The policy change was submitted to and agreed by Suffolk Coast Forum in June 2019, subject to community positive consultation. The Suffolk Coast Forum has representation from:
- Coastal Partnership East
 - East Suffolk Council, Babergh District Council, Ipswich Borough Council, Suffolk County Council
 - The Estuary Partnerships (Blyth, Alde & Ore, Deben and Stour & Orwell)
 - Government Agencies including Natural England, Environment Agency and Marine Management Organisation
 - Marine Pioneer
 - East Suffolk Internal Drainage Board
 - Eastern Regional Flood and Coastal Committee
 - Suffolk Coast & Heaths Area of Outstanding Natural Beauty
 - Suffolk Coast Against Retreat (SCAR) - a community-based organisation

Associate members include:

- RSPB
- National Farmers' Union
- Country Land & Business Association
- Crown Estate
- National Trust

5 OTHER KEY ISSUES

- 5.1 Not applicable.

6 CONSULTATION

- 6.1 A major change in SMP policy requires a public consultation before this change can be progressed to local authority approval.
- 6.2 The consultation was run from 1st October to 30th November 2019. The consultation was targeted at the wider public, including individuals, community or interest groups and impacted Parish Councils. Everyone was invited to get involved through visiting the council website (www.coasteast.org.uk) to view the options report and complete an on-line questionnaire, by email, or by attending community drop-ins held on Friday 18th

October (3 pm – 7 pm) and Saturday 19th October (10 am – 1 pm) at Aldeburgh Community and Sports Centre.

- 6.3 A total of 152 responses were received, with 180 people attending the drop-in events. The majority of responses were from residents (51% of those who provided details) or local to the area (24% of those who provided details). Responses were also received from community representatives, business owners, holiday home owners and visitors.
- 6.4 Of the 152 respondents, 147 supported the proposed change in policy (97%), 4 disagreed with the change and 1 person did not express a preference. This represents exceptional support from the community.

7 OTHER OPTIONS CONSIDERED

- 7.1 **No change from the current SMP policy (No Active Intervention).** This policy would mean there would be no further management of this frontage in the future. As the shingle ridge is already narrow, there is a risk that this would result in a permanent opening forming, linking the open sea and the estuary. There could be a significant and uncertain effect on the wider estuary and the natural and human environment it supports. This would also not align with the vision of the Alde and Ore Estuary Plan.
- 7.2 **Hold the Line policy.** This was considered but it was discounted due to: technical challenges to delivering this option and long-term sustainability issues, the potential impact on coastal processes, significant negative impacts on the natural environment, substantial costs both now and continuing in the future.

8 REASON FOR RECOMMENDATION

- 8.1 There was no formal policy identified in the SMP, instead an interim policy of No Active Intervention was defined. Since the SMP the shingle barrier has narrowed further and there is a high risk of it becoming breached. A formation of a permanent breach would have significant impacts on the Alde-Ore Estuary, which are very uncertain at present. This outcome would also be contrary to the objectives of the Alde and Ore Estuary Plan, which was endorsed by the Local Authorities after the SMP was adopted.
- 8.2 A revised policy of Managed Realignment will enable the council, working together with the Environment Agency, to provide resilience against erosion whilst working with a dynamic coast, through maintaining the shingle ridge to minimise the risk of a permanent breach. This does not, however, commit the local council to additional financial expenditure, but does allow a more flexible approach to the situation than the current interim policy of no active intervention, which infers no further investment or management works.
- 8.3 Any future works will, however, still need to appraise the potential loss or damage to internationally designated habitats within the site.
- 8.4 There is a consensus between those agencies that manage the coast in Suffolk, as well as significant support from the local community, for the proposed change to this SMP policy.

RECOMMENDATIONS

1. That SMP Policy Unit ORF15.1 – Sudbourne Beach to be changed to Managed Realignment in all 3 epochs
2. That the text in the SMP Policy Unit ORF15.1 is revised to:-

| | Policy Plan | | | Comment |
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| | 2025 | 2055 | 2105 | |
| Existing policy | Hold the Line | No Active Intervention | No Active Intervention | An interim policy pending an agreed Management and Investment Plan for the Alde and Ore area. |
| Revised policy | Managed realignment | Managed realignment | Managed realignment | Measures to maintain barrier resilience and minimise the risk of a permanent breach forming, whilst working with the dynamic coastline and ensuring continued sediment connectivity. |

BACKGROUND PAPERS

Please note that copies of background papers have not been published on the Council's website www.eastsuffolk.gov.uk but copies of the background papers listed below are available for public inspection free of charge by contacting the relevant Council Department.

| Date | Type | Available From |
|--------------|--|---|
| 2018-2019 | Stage 1, 2 & 3 of the SMP Review | https://www.coasteast.org.uk/media/1420/screening-appraisal-document-draft-issue-v1-3-inc-app.pdf |
| June 2016 | Geomorphological Report on policy unit ORF15.1 | https://www.coasteast.org.uk/media/1419/geomorphological-assessment-of-smp2-coastal-managment-area-orf-151-report-to-the-aoa-final-220616.pdf |
| October 2019 | Consultation Booklet for Slaughden SMP Review | https://www.coasteast.org.uk/media/1422/slaughden-booklet-2019.pdf |
| June 2019 | Jacobs Presentation to SCF | https://www.coasteast.org.uk/media/1424/scf-presentation-13-june-2019-slaughden.pdf |