

## **ANNEX 4 - Coastal Planning**

### **Land use and Marine Planning Integration**

NPF4 should highlight the need for integration and joined up working between the land use and marine planning regimes. This is particularly important for the sectors including offshore renewable energy, ports and harbours and aquaculture and for addressing the challenges of climate change. In the Orkney context, the regional spatial strategy provides an important opportunity to establish a spatial development framework across land and sea to enable an integrated approach to the local development plan, regional marine plan and associated development projects.

### **Coastal Change and Protection**

New development should not place a significant burden on public authorities to invest in coastal defence infrastructure except where there is clear justification to depart from this policy. This principle should be maintained in NPF4.

There is a need for integration between the flood risk management and coastal protection planning activities of SEPA/local authorities and local development planning.

Policy in NPF4 should emphasise the importance of protecting coastal and marine ecosystems, particularly geomorphological features, to avoid significant disturbance and degradation, and to safeguard and enhance the coastal protection services these features provide. There is a potential role for NPF4, local development plans and regional marine plans to identify, protect and enhance the resilience of natural features providing coastal protection services.

The Orkney Local Development Plan policy on Coastal Change states that:

*'i. New development will not generally be supported in areas that are vulnerable to adverse effects of coastal erosion and/or wider coastal change as identified in the National Coastal Change Assessment (now Dynamic Coast). Where new development is adaptive to anticipated coastal change, and therefore avoids the need for intervention over its lifetime, the development may be permitted.*

*ii. When there is clear justification for a departure from the general policy to avoid new development in areas that are vulnerable to adverse effects of coastal erosion and/or wider coastal change, development proposals will be required to demonstrate that appropriate resilience and adaptation strategies have been incorporated over the lifetime of the development'.*

This general policy approach is broadly considered fit for purpose and Dynamic Coast provides a useful mapping resource to identify areas that are vulnerable to coastal erosion etc. The 7 Super Sites, which include Skara Brae/Bay of Skail in Orkney, will also provide useful data to inform future adaptation and resilience plans. It will be necessary to further apply the Super Site modelling approach, or similar, to wider vulnerable sites across Orkney to model and inform future planning scenarios.

To inform future local planning policy, OIC will need to work in partnership with SEPA, Scottish Government, the Dynamic Coast team etc to look at specific locations that are vulnerable to coastal change, on a priority basis, to gain a finer grain understanding of predicted change/impacts. This approach should benefit from funding. The protection of key assets and infrastructure should inform the focus/priority for this work.

## **Coastal Development**

Island planning authorities should be able to develop bespoke approaches to coastal development policy to respond to the coastal characteristics of island groups.

SPP currently requires that *'Plans should identify areas of largely developed coast that are a major focus of economic or recreational activity that are likely to be suitable for further development; areas subject to significant constraints; and largely unspoiled areas of the coast that are generally unsuitable for development'*.

In the current Orkney Local Development Plan, our coastal settlements identify the areas of largely developed coast that are the main focus of economic and recreational activity and that are suitable for further coastal development. The Plan promotes these settlements as the focus for development requiring a coastal location and specific industrial and business allocations have been designated in close proximity to Orkney's key commercial ports. In line with other policies in the Plan, there must be a specific locational requirement for any coastal development proposal outwith the settlements and it must be demonstrated that any environmental impacts can be satisfactorily addressed.

With regards to the approach to coastal development set out in SPP (Paragraphs 89 and 90), a specific policy approach should be developed which takes account of the distinct landscape/coastal characteristics of island groups. Within the Orkney context, the character of the coast and wider landscape are inseparable; there is an inherent relationship between the coast and the entire land area. Essentially all land areas are considered to be coastal in character. This presents a significant challenge when defining a specific coastal zone that is distinct from other land areas, and the subsequent identification of areas that are subject to significant constraint and areas that are unsuitable for development.

The SPP coastal planning approach would work well in mainland Scotland or large island contexts, where there is a landscape interior and clearly distinct coastal areas. With our smaller island geography, coastal development restrictions could potentially sterilise development across large swathes of Orkney which would be difficult to justify solely for the purpose of protecting coastal areas. It is therefore considered appropriate for the protection of coastal landscapes to be considered within the context of the landscape character of our islands as a whole.

The preferred approach in Orkney is to direct developments that require a coastal location to developed areas of coast within existing coastal settlements unless there is a demonstrable need for a coastal location in the countryside, which cannot be accommodated within settlements, and where other relevant Development Plan policies are satisfied.

It is not considered appropriate to designate areas of coast that are subject to significant constraint and unspoiled areas of the coast that are unsuitable for development. OLDP Policy N1 states that 'Development will only be permitted where the scale, location, siting and design of the development will not have a significant adverse effect, either individually or cumulatively,

on the landscape or townscape character of the area as identified in the Orkney Landscape Character Assessment'. An up to date Landscape Character Assessment for Orkney should be used as a key tool to ensure landscape considerations guide the location, scale, siting and design of coastal and wider development. In practice, OLDP Policy N1 provides appropriate protection for coastal areas within the National Scenic Area and the LDP landscape policy also provide appropriate policy protection for coastal areas of Wild Land.